

EXHIBIT 105

VOLUME 1
PAGES: 1-311
EXHIBITS: See Index

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

THOMSON REUTERS ENTERPRISE
CENTRE GMBH and WEST
PUBLISHING CORPORATION,

Plaintiffs and
Counterdefendants,

v.

ROSS INTELLIGENCE, INC.,

Defendant and
Counterclaimant.

C.A. No. 20-613 (LPS)

HIGHLY CONFIDENTIAL

VIDEOTAPED DEPOSITION of ANDREW ARRUDA

- CONDUCTED BY VIDEOCONFERENCE -

Wednesday, March 30, 2022

9:06 a.m. Pacific Daylight Time

Michelle Keegan, RMR, CRR

Lexitas

508-478-9795 ~ 508-478.0595 (Fax)

www.LexitasLegal.com

A P P E A R A N C E S:

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By: Eric Loverro, Esq.

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Publishing

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Phone: (202) 624-2500

Email: cberry@crowell.com

Counsel for Defendant ROSS Intelligence, Inc.

Also Present:

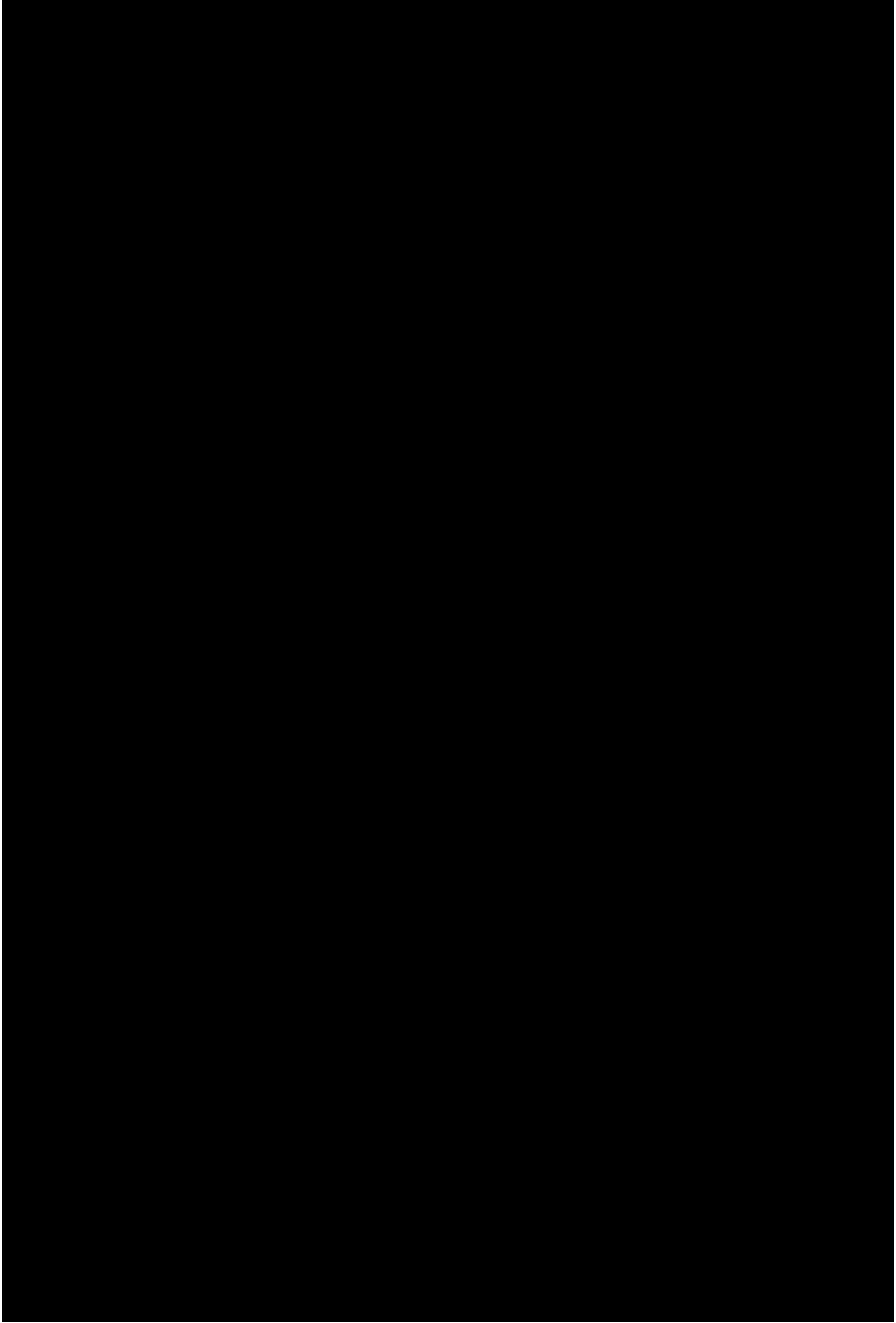
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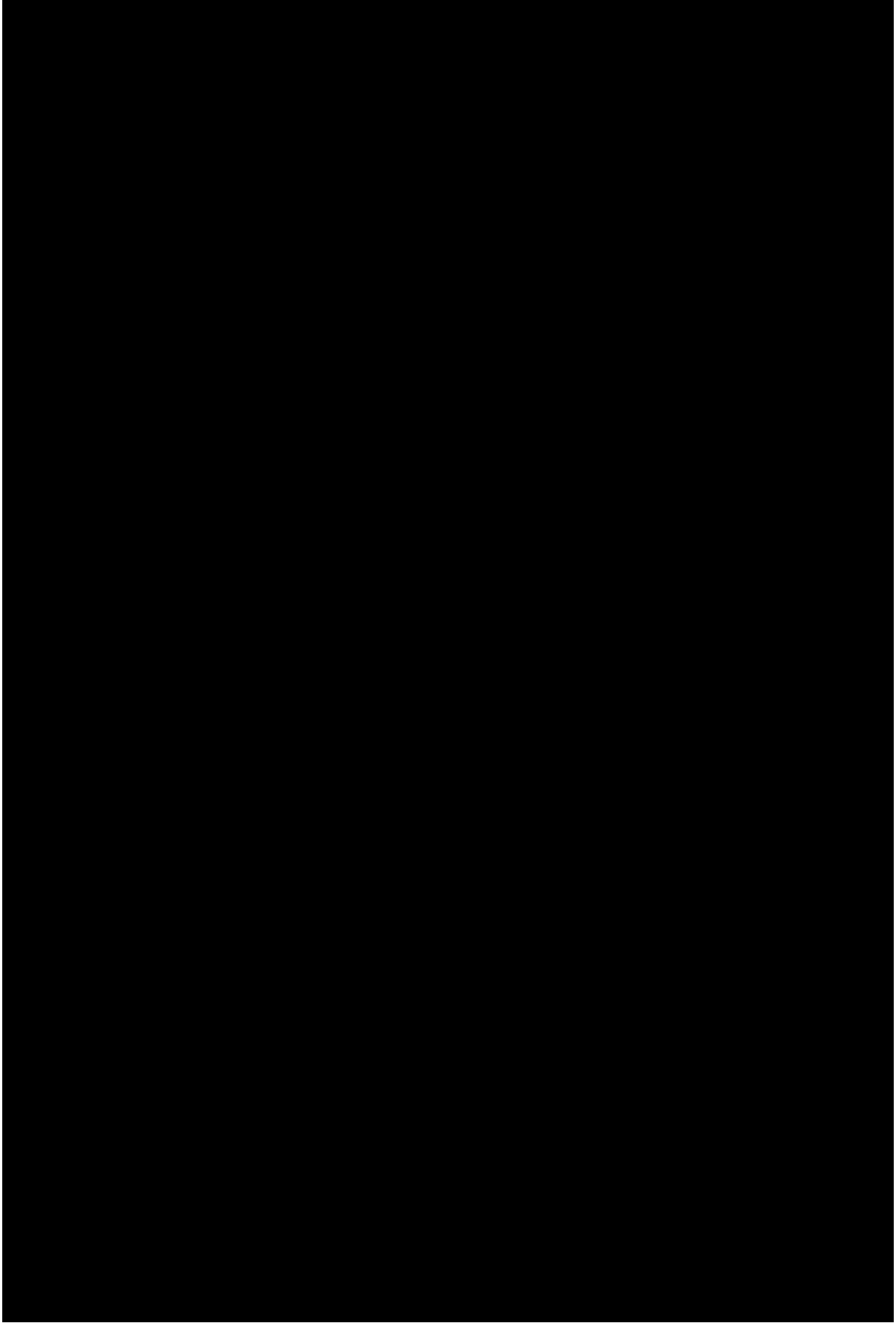
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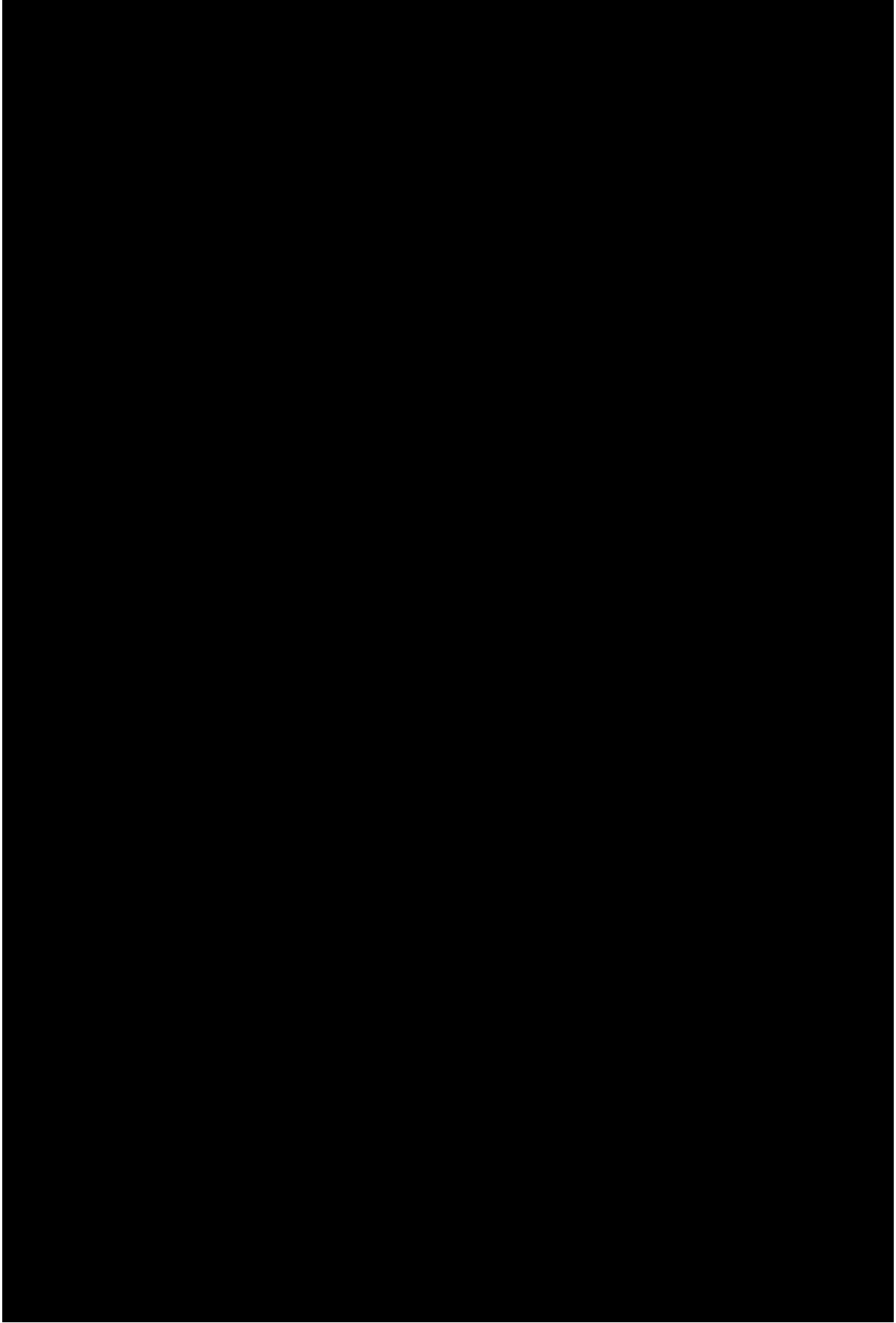
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ANDREW ARRUDA	
By Ms. Cendali	9

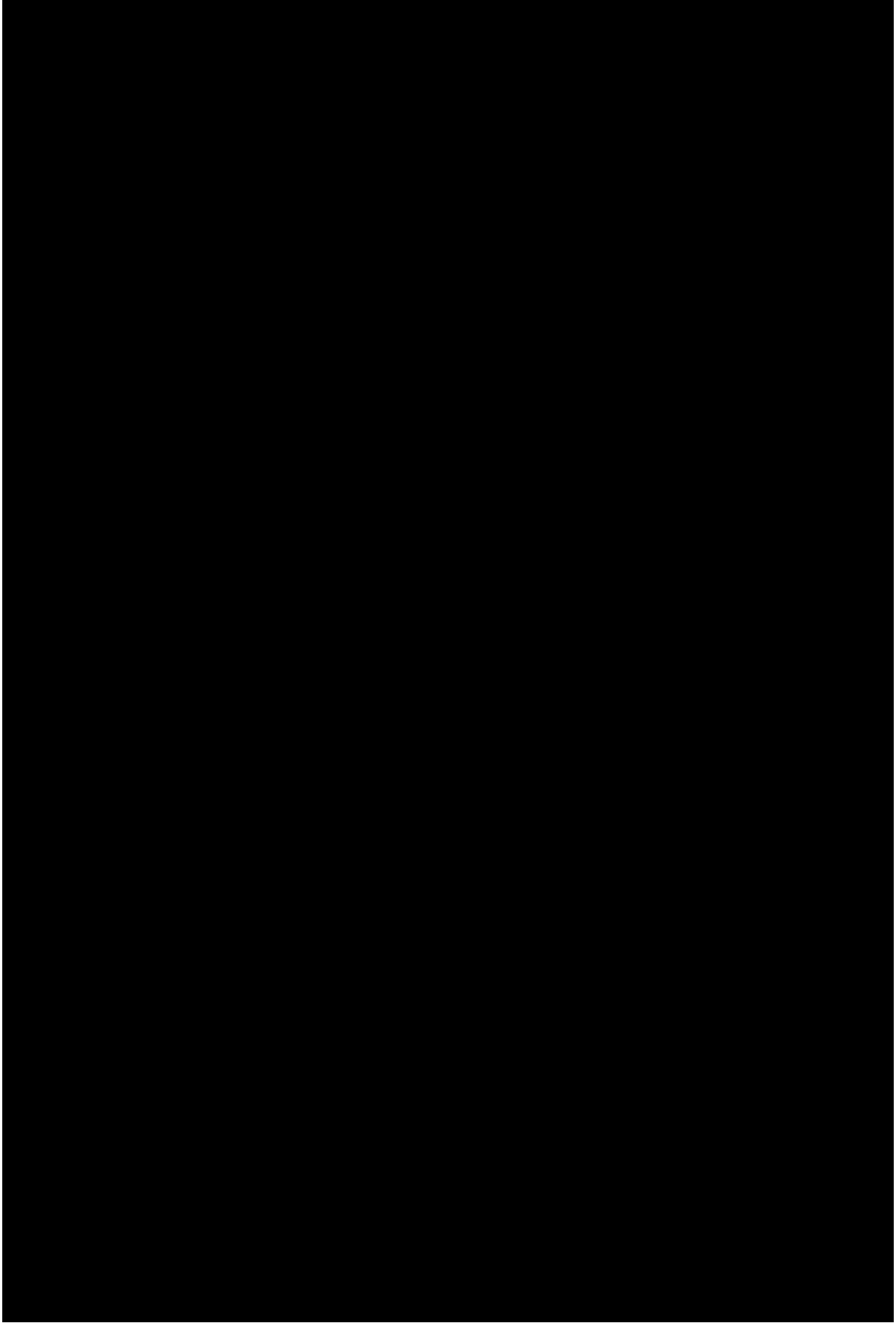
E X H I B I T S

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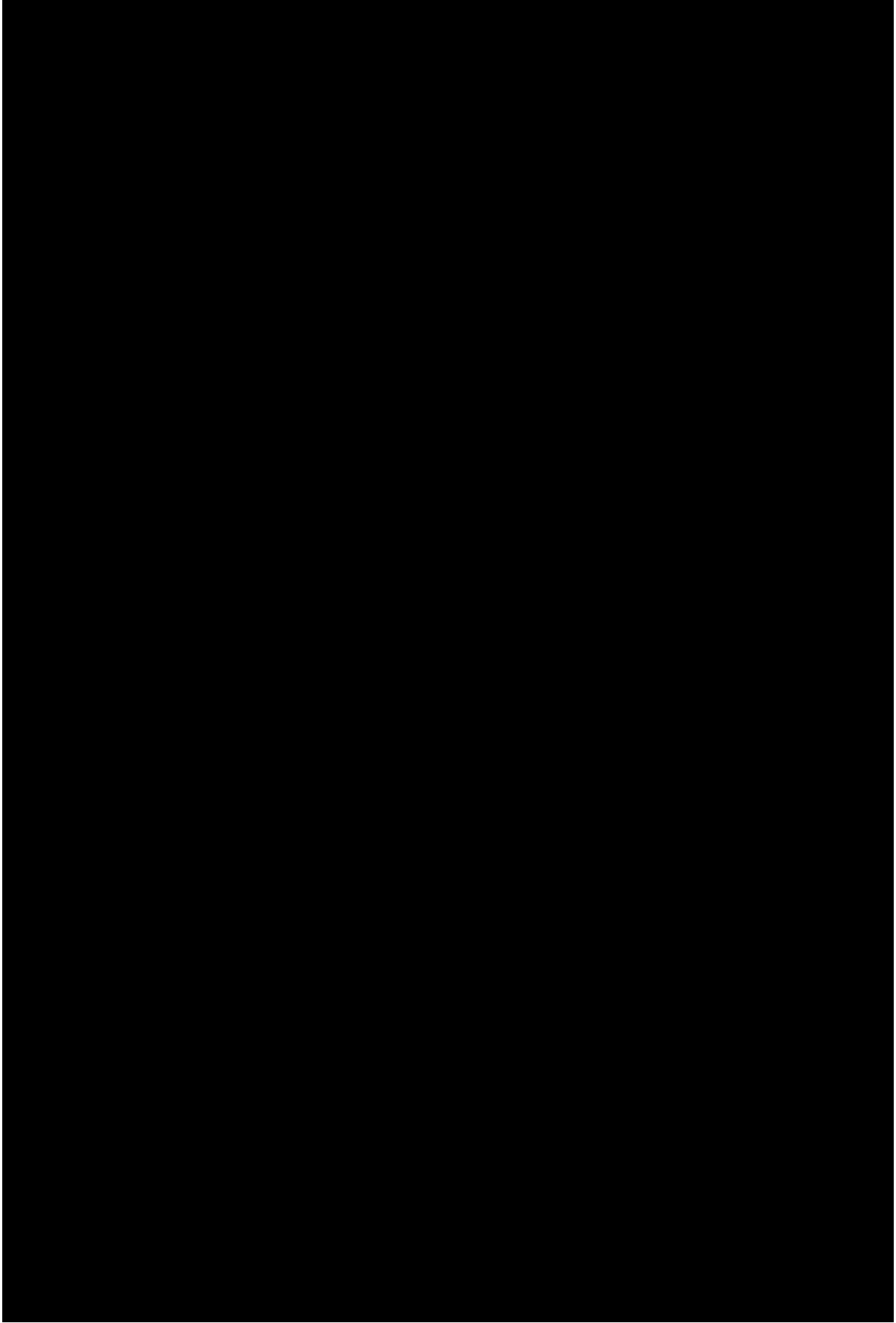


EXHIBIT 106

1 UNITED STATES DISTRICT COURT
2 FOR THE DISTRICT OF DELAWARE

3

4 THOMSON REUTERS ENTERPRISE
5 CENTRE GMBH AND WEST
6 PUBLISHING CORPORATION,

7 PLAINTIFFS AND
8 COUNTERDEFENDANTS,

9

vs.

No. 20-613 (LPS)

10

ROSS INTELLIGENCE INC.,

11

12 DEFENDANT AND
13 COUNTERCLAIMANT.

14

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VIDEOTAPED DEPOSITION OF

18

PARGLES DALL'OGGIO

19

HIGHLY CONFIDENTIAL

20

Wednesday, March 9, 2022

21

REPORTED REMOTELY VIA ZOOM

22

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25

Reported By:

KATHLEEN MALTBIE, STENOGRAPHIC REPORTER, CSR 10068

RPR-RMR-CRR-CCRR-CLR-CRC (Via Zoom Videoconference)

1 VIDEOTAPED DEPOSITION OF PARGLES DALL'OGLIO

2 BE IT REMEMBERED that on Wednesday,
3 March 9, 2022, commencing at the hour of 9:28 a.m.
4 thereof, before me, Kathleen A. Maltbie,
5 RPR-RMR-CRR-CCRR-CLR-CRC, a Certified Stenographic
6 Shorthand Reporter, in and for the State of
7 California, personally appeared PARGLES DALL'OGLIO,
8 remotely via Zoom videoconference, a witness in the
9 above-entitled court and cause, who, being by me
10 first remotely duly sworn, was thereupon examined as
11 a witness in said action.

APPEARANCES OF COUNSEL

FOR THE PLAINTIFFS AND COUNTERDEFENDANTS:

KIRKLAND & ELLIS LLP
601 Lexington Avenue
New York, New York 10022
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ERIC A. LOVERRO, ESQ.
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Email: Joshua.simmons@kirkland.com
Eric.loverro@kirkland.com

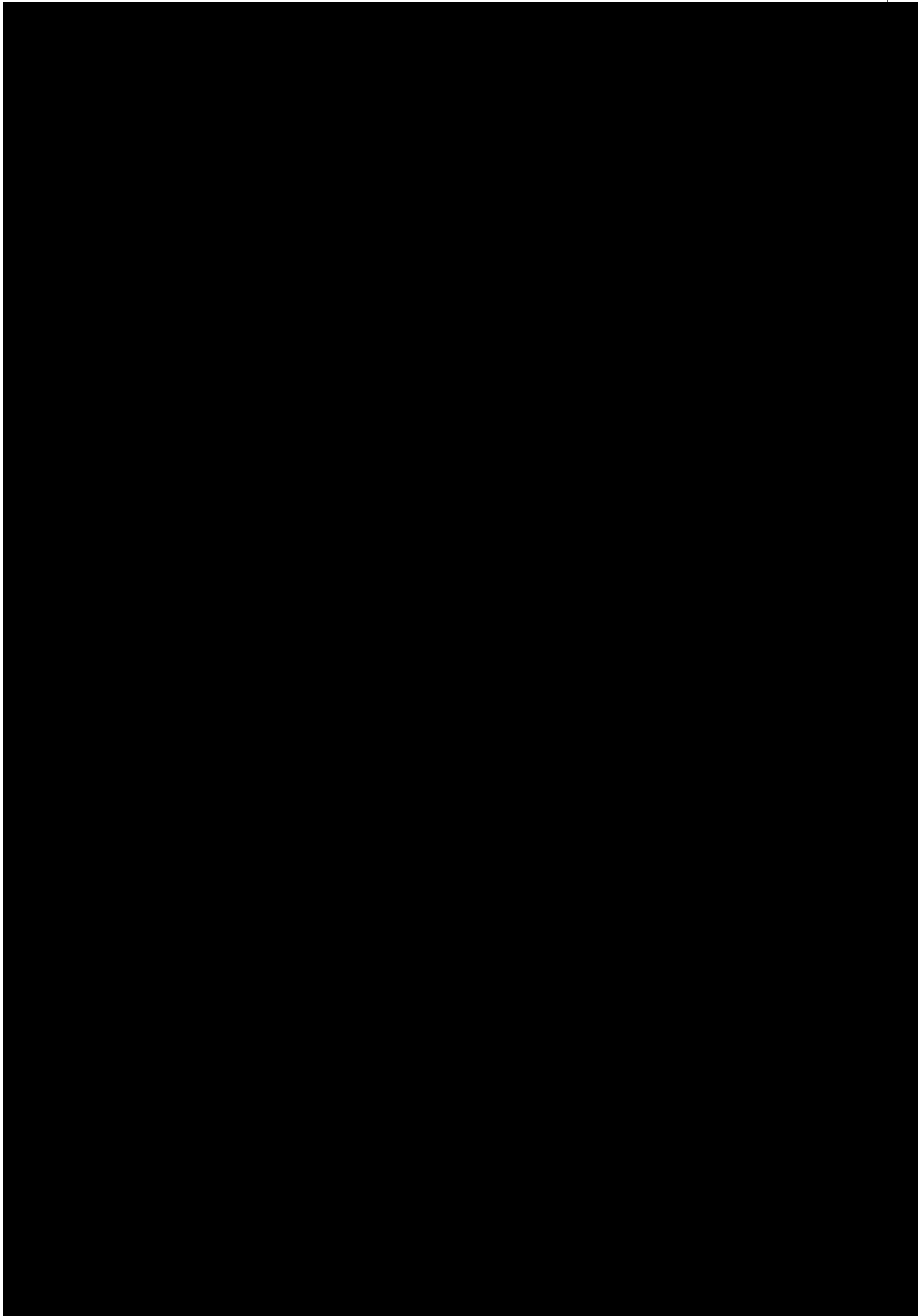
FOR THE DEFENDANT AND COUNTERCLAIMANT:

(Via Zoom Videoconference)
CROWELL & MORING LLP
Three Embarcadero Center, 26th Floor
San Francisco, California 94111
BY: KAYVAN M. GHAFARI, ESQ.
KEVIN C. CACABELOS, ESQ.
Telephone: (415) 365-7223
Email: Kghaffari@crowell.com
kcacabelos@crowell.com

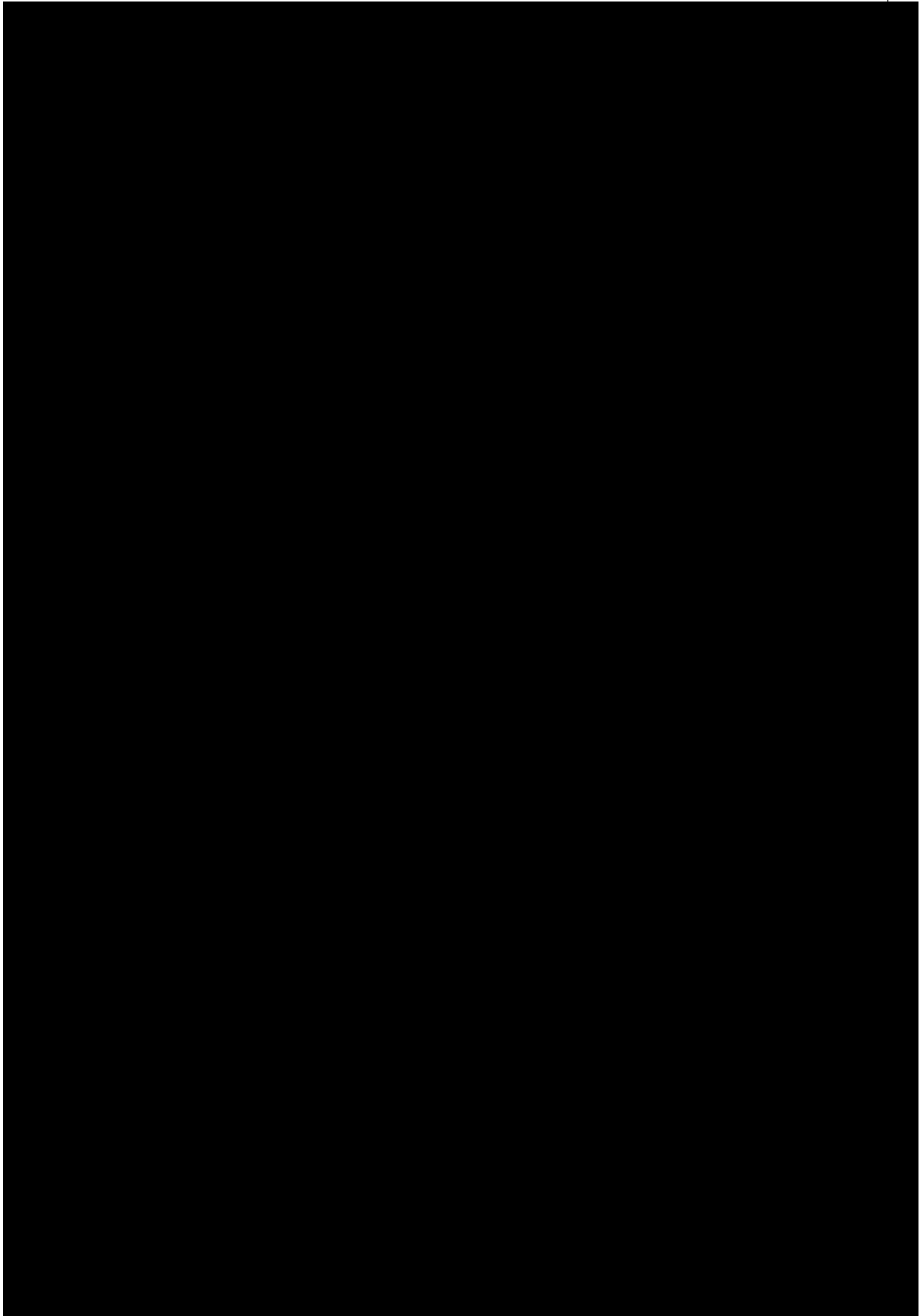
ALSO PRESENT:

(Via Zoom Videoconference)
Jacob Figueroa, Videographer

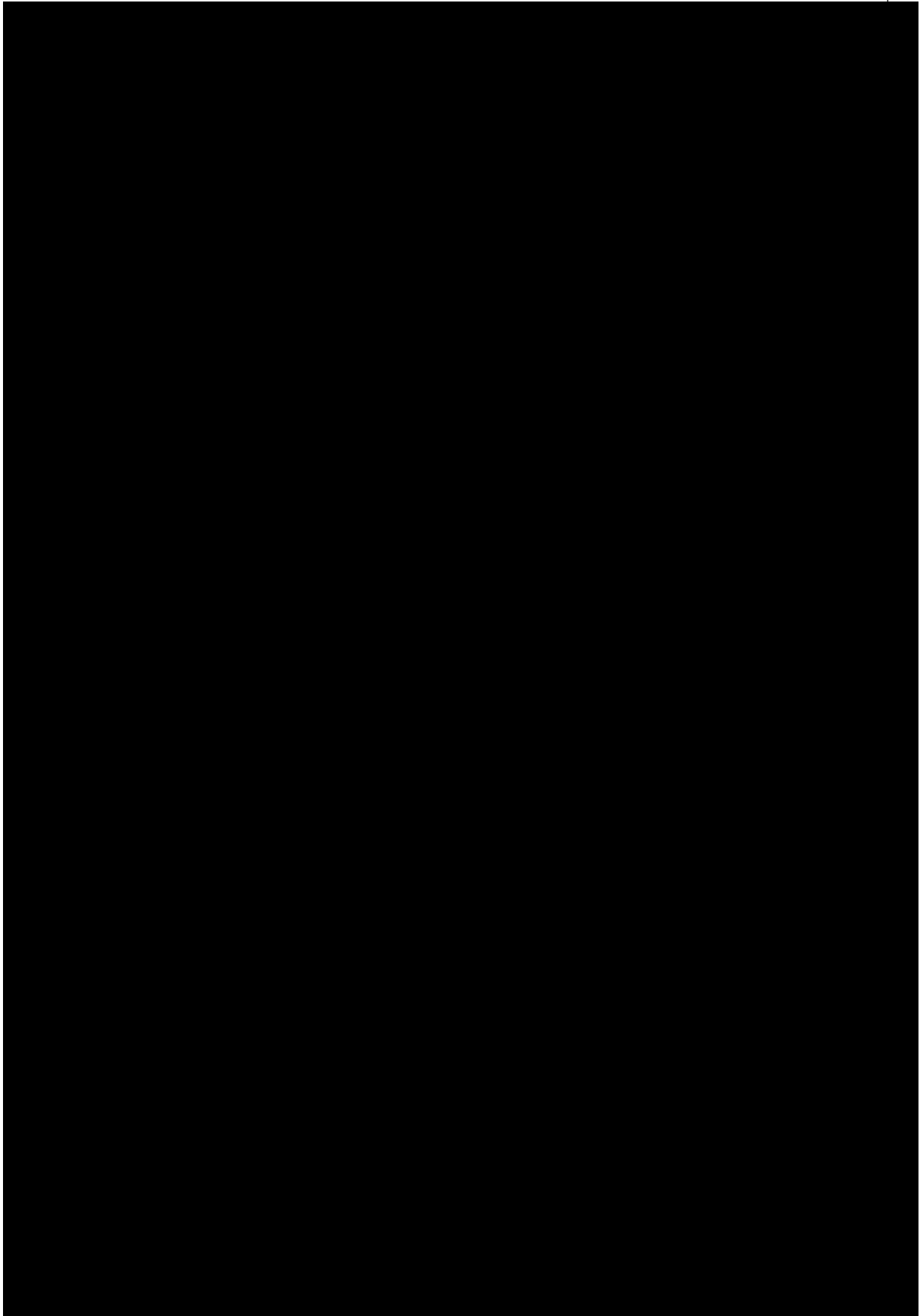
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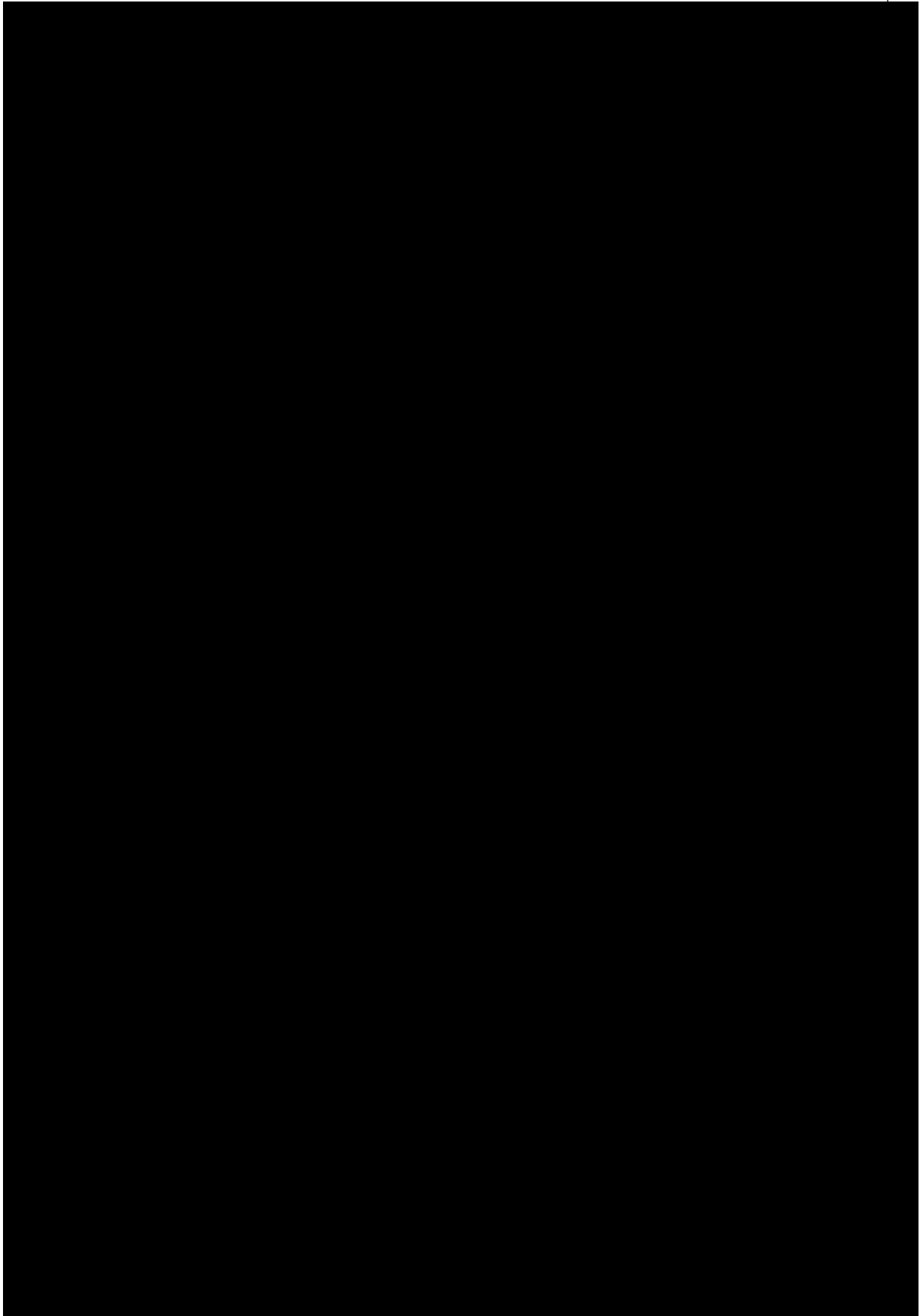


EXHIBIT 107

1
2 IN THE UNITED STATES DISTRICT COURT
3 FOR THE DISTRICT OF DELAWARE
4 Case No. 20-613 (LPS)

5 IN RE MATTER OF:

6 THOMSON REUTERS ENTERPRISE
CENTRE GMBH and WEST
PUBLISHING CORPORATION,

7 Plaintiffs and
8 Counter-Defendants,

9 vs.

10 ROSS INTELLIGENCE INC.,

11 Defendant and
12 Counterclaimant.

13 ** HIGHLY CONFIDENTIAL **

14 ** ATTORNEYS' EYES ONLY **
15

16 REMOTE VIDEOTAPED DEPOSITION OF

17 THOMAS HAMILTON
18

19 Thursday, May 4, 2023

20 11:57 a.m. (EST)
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22
23 Reported By:

24 Joan Ferrara, RMR, FCRR

25 Job No. 2023-892415

May 4, 2023

11:57 a.m. (EST)

Videotaped Deposition of THOMAS
HAMILTON, held remotely via Zoom, before
Joan Ferrara, a Registered Merit Reporter,
Federal Certified Realtime Reporter and
Notary Public.

REMOTE APPEARANCES:

ON BEHALF OF PLAINTIFFS/COUNTER-DEFENDANTS:

KIRKLAND & ELLIS LLP

200 Clarendon Street

Boston, Massachusetts 02116

BY: CHRISTA COTTRELL, ESQ.

LEXI WUNG, ESQ.

ON BEHALF OF DEFENDANT/COUNTERCLAIMANT:

CROWELL & MORING LLP

3 Embarcadero Center

26th Floor

San Francisco, California 94111

BY: JOACHIM STEINBERG, ESQ.

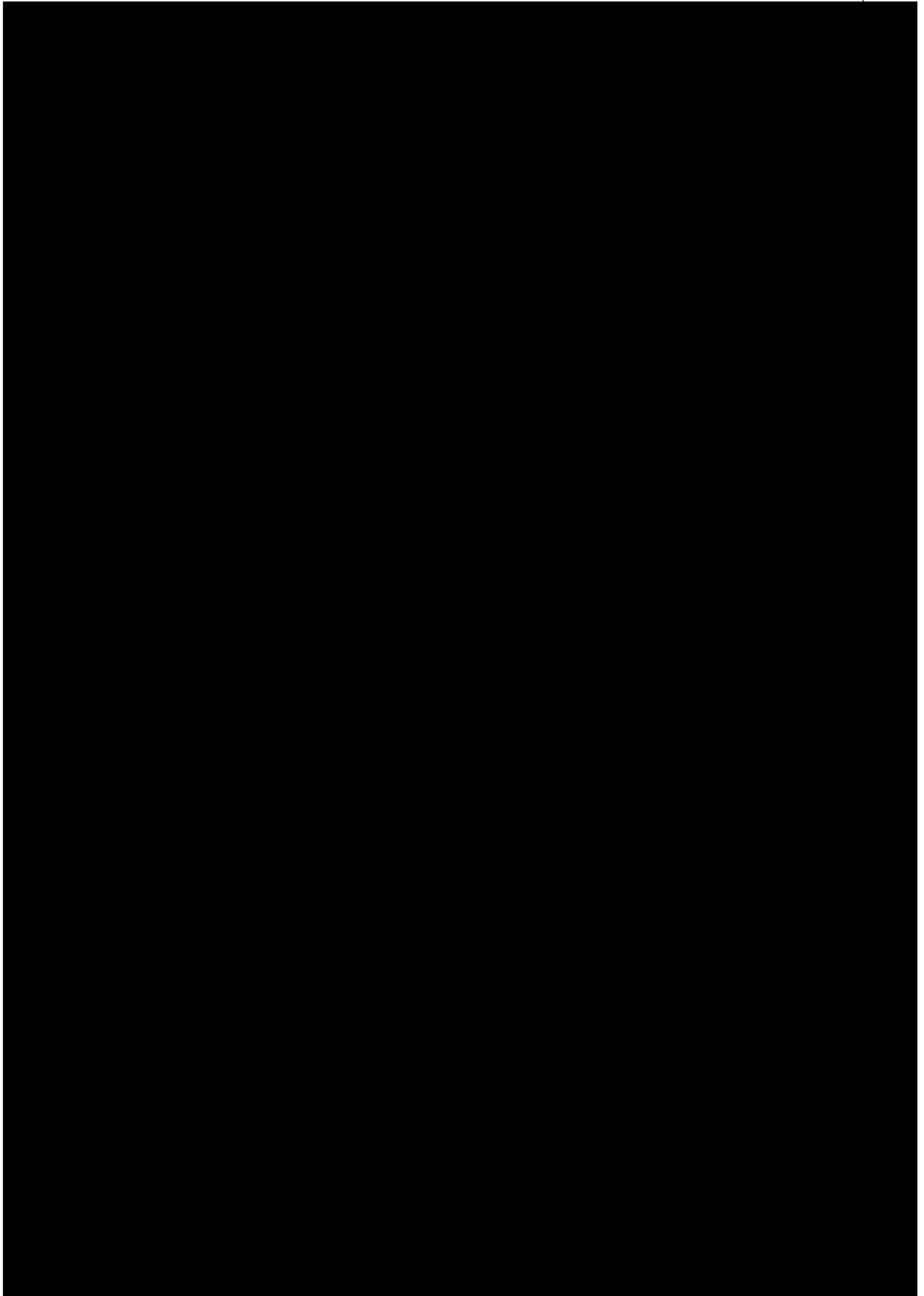
ANNA SABER, ESQ.

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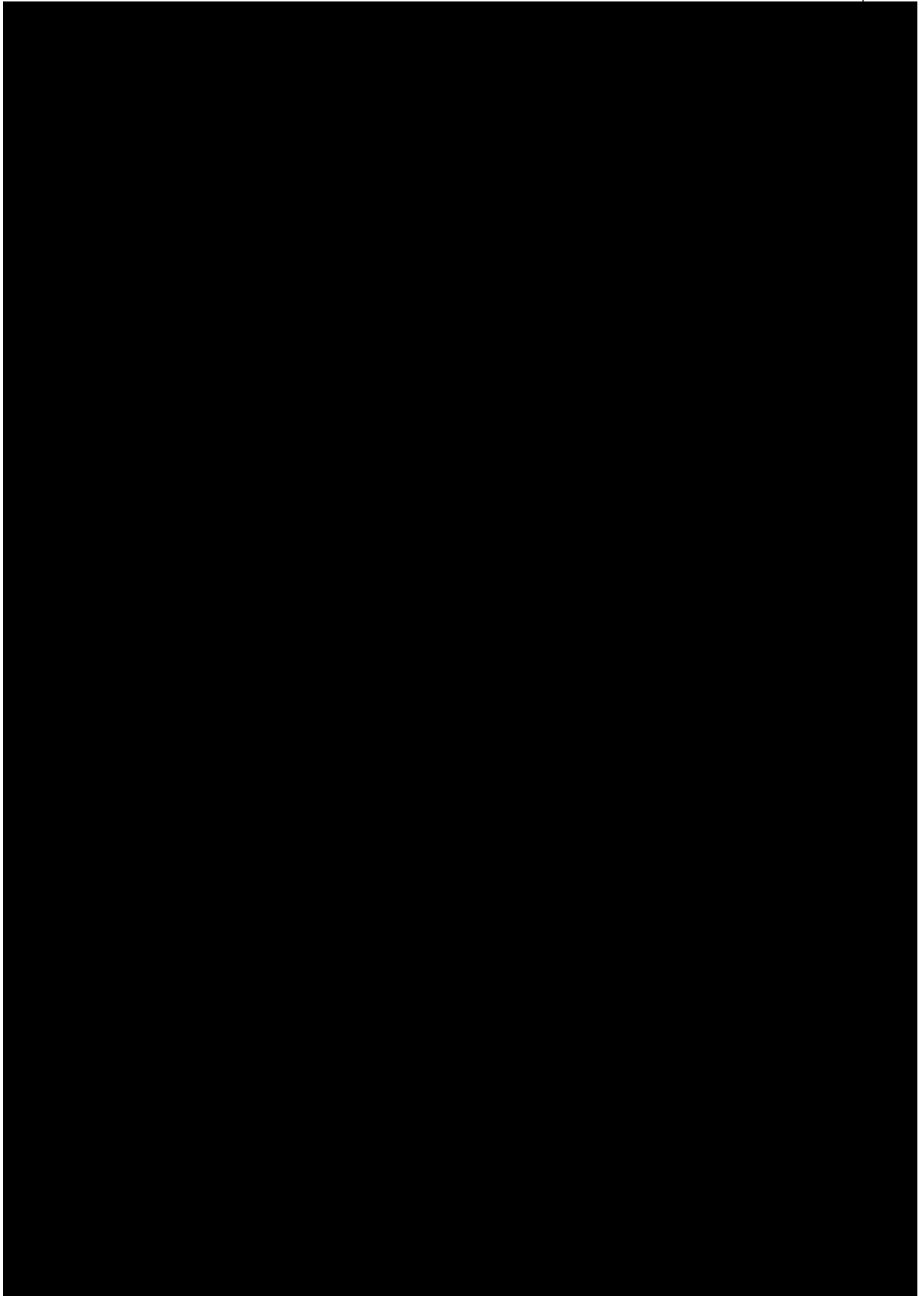
BRYAN BELTRAN, Videographer

JOSE LOPEZ, Kirkland Tech

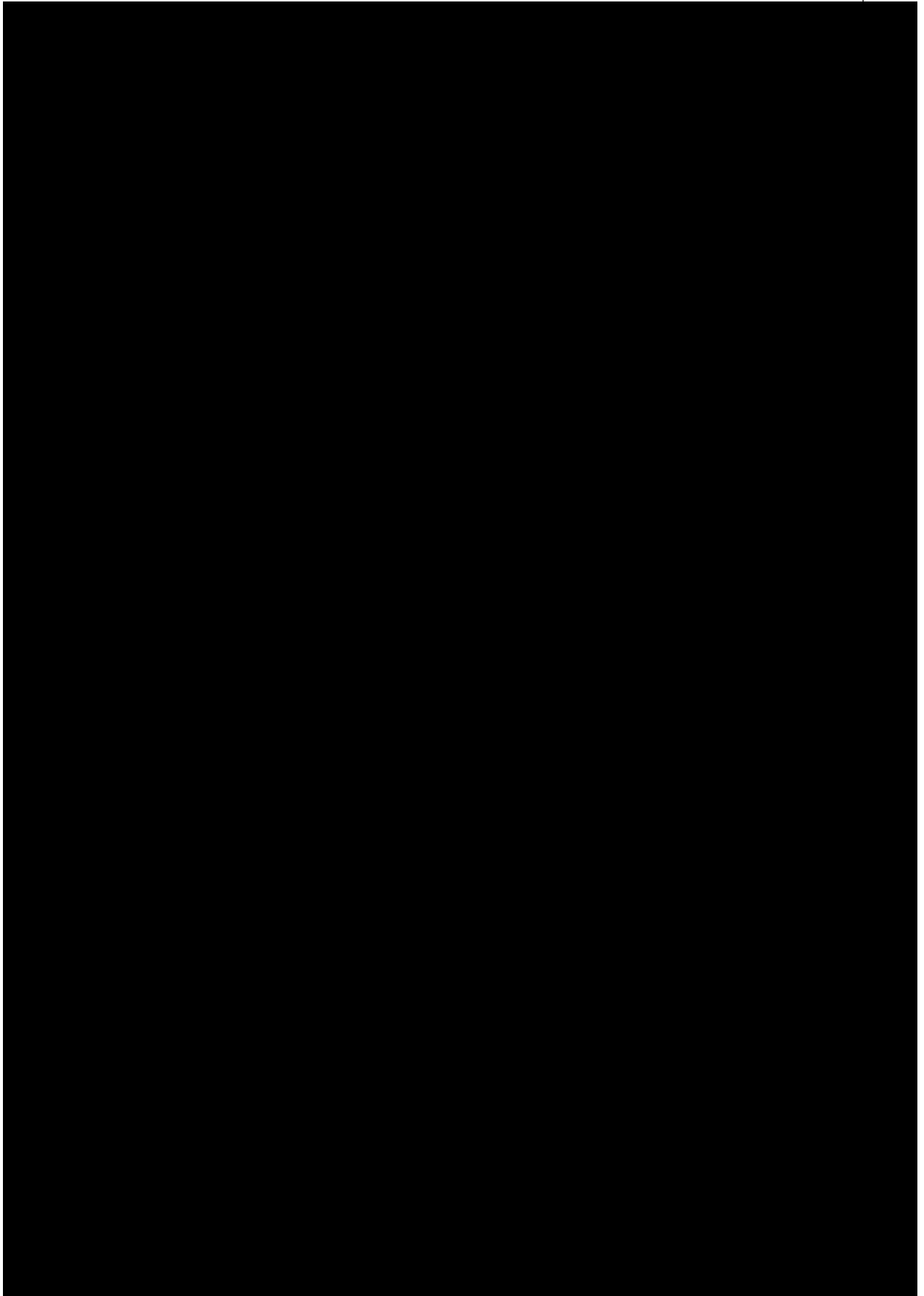
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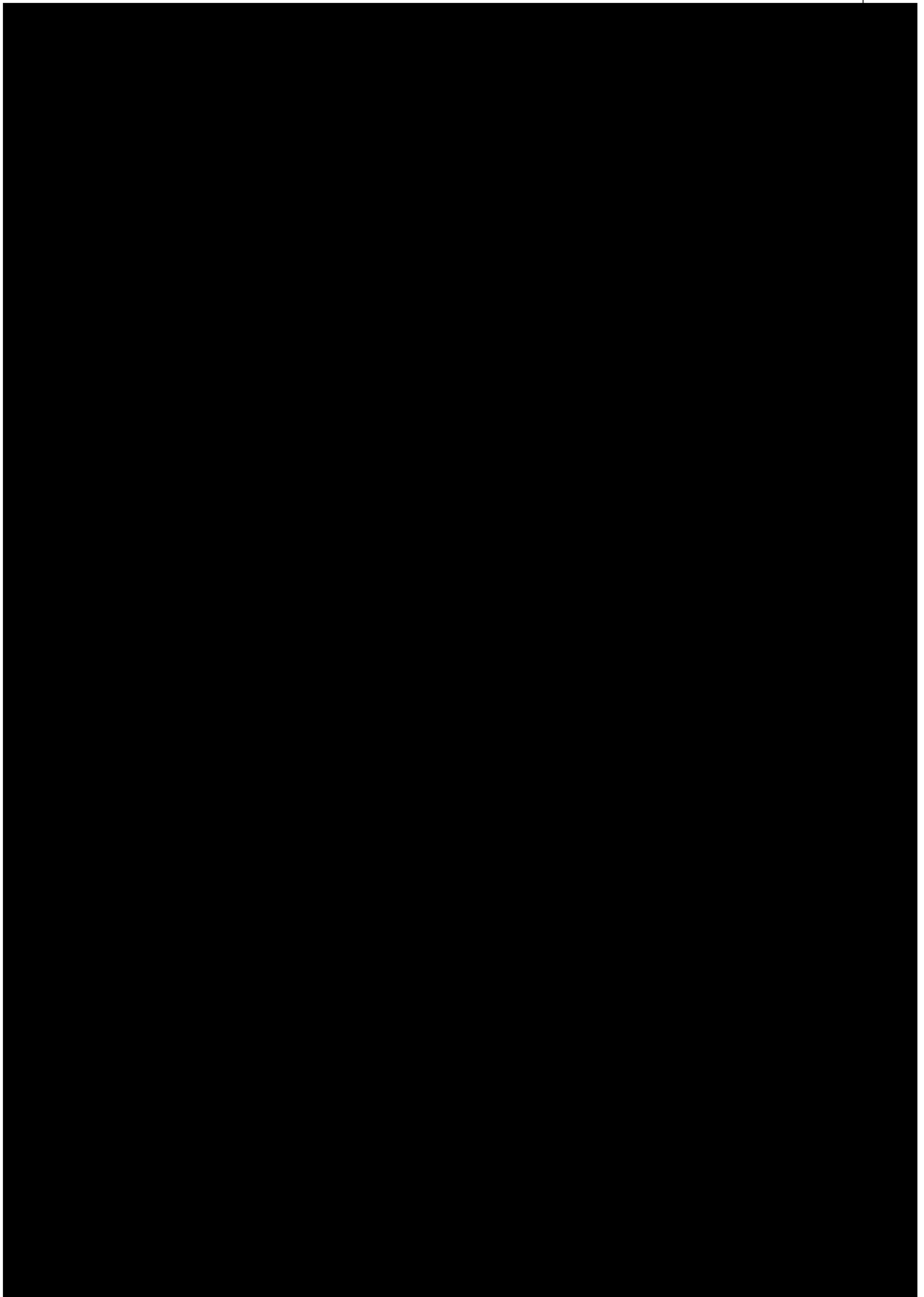
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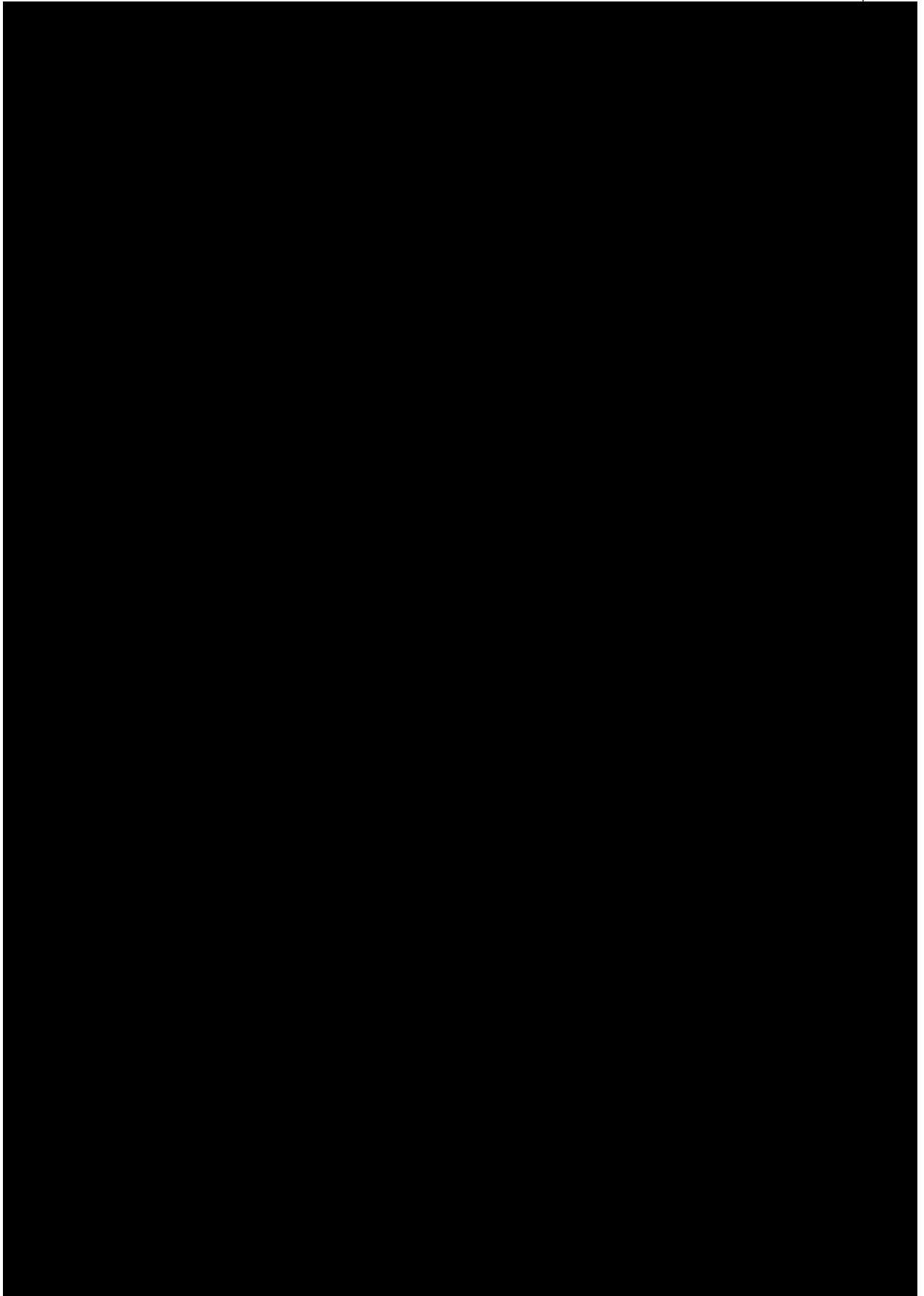
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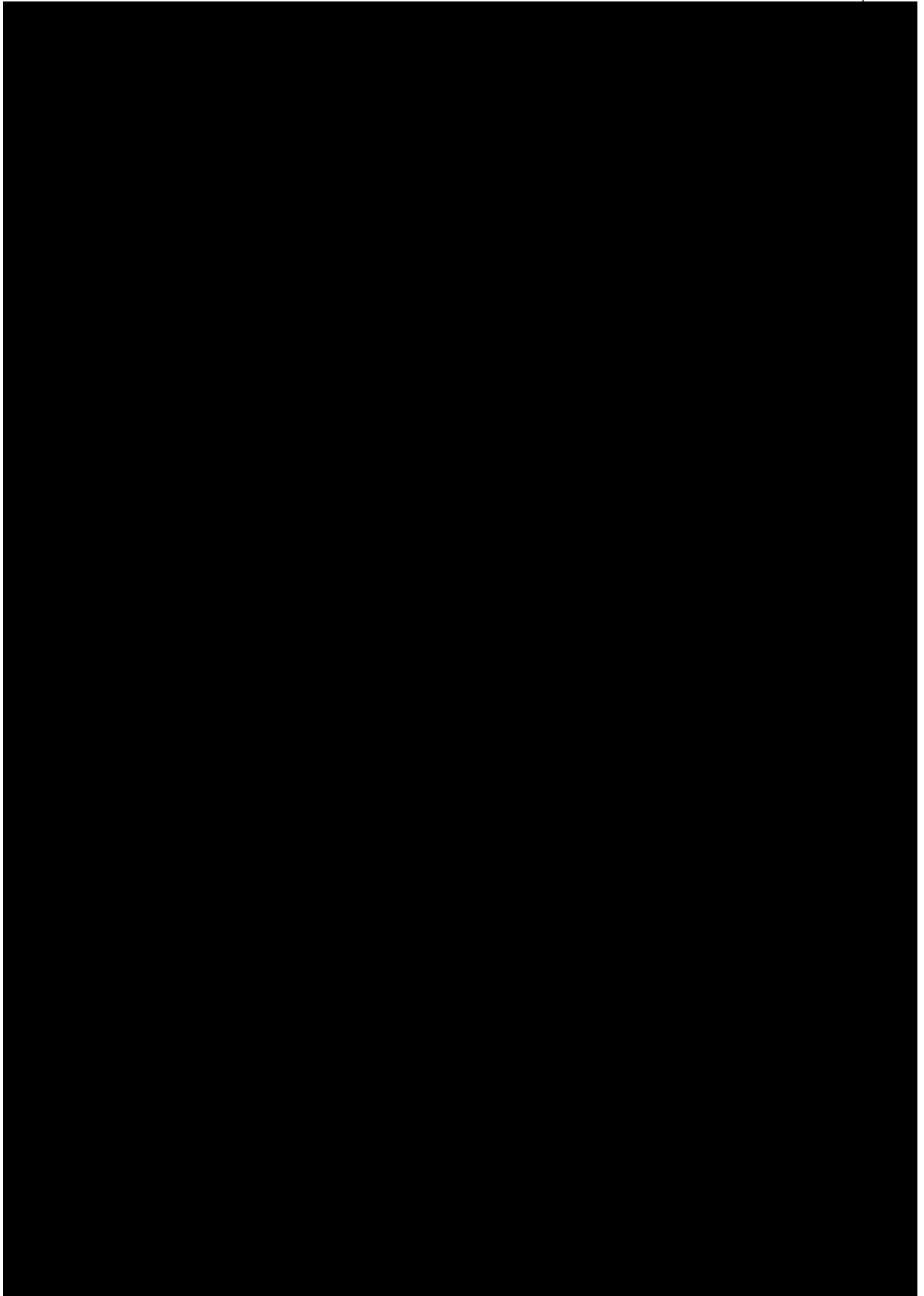
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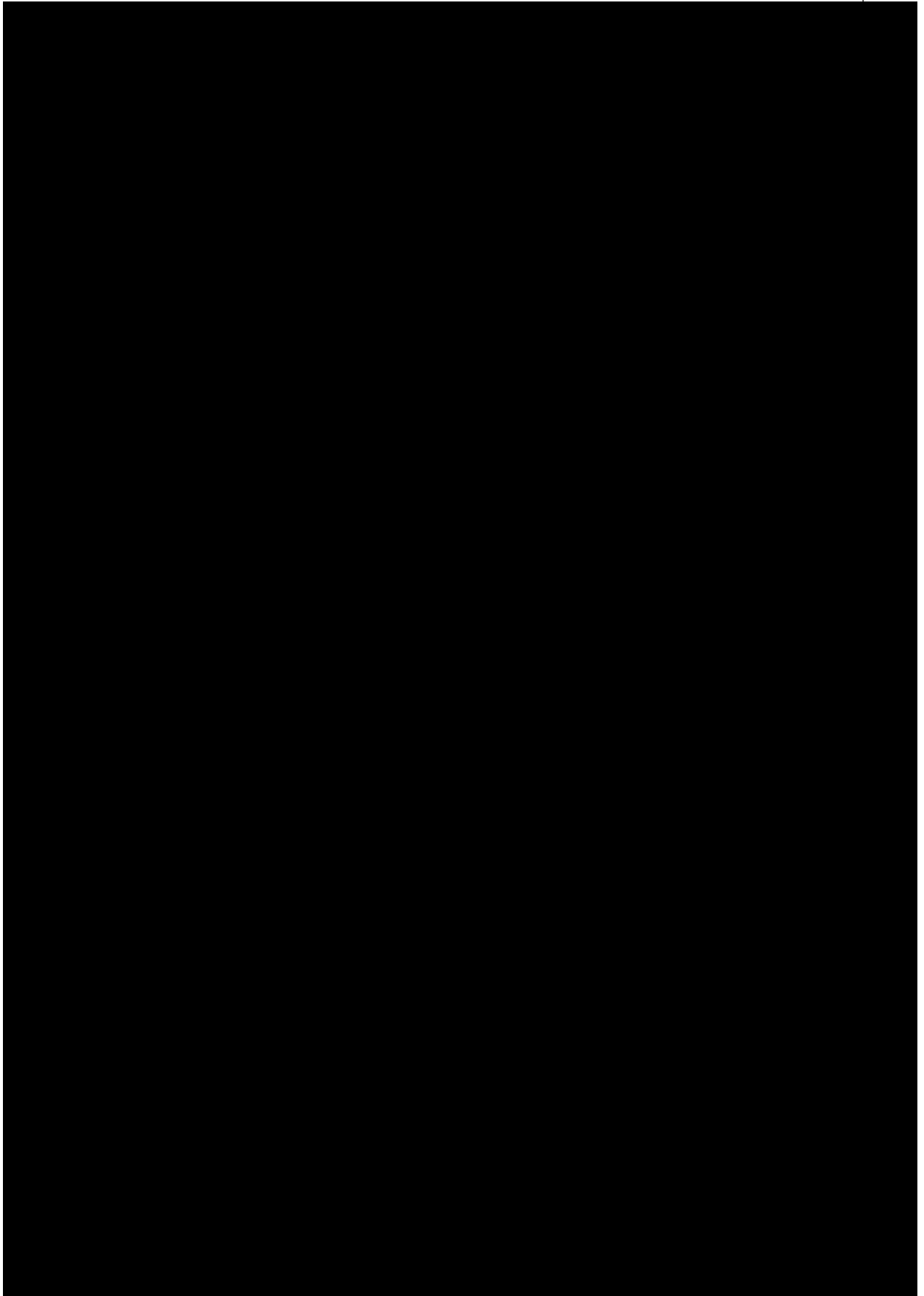
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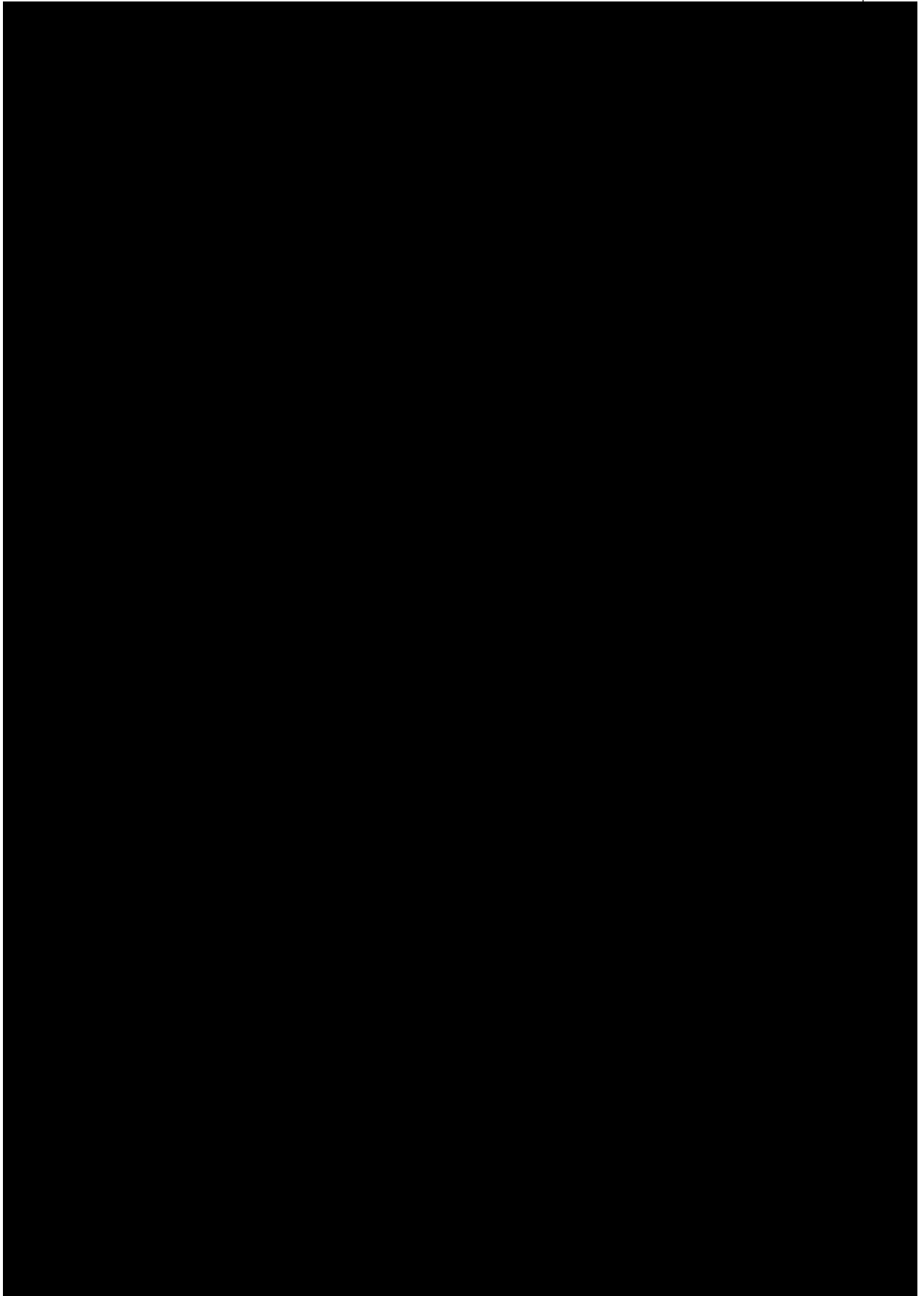


EXHIBIT 108

1
2 IN THE UNITED STATES DISTRICT COURT
3 FOR THE DISTRICT OF DELAWARE
4 Case No. 20-613 (LPS)

5 IN RE MATTER OF:

6 THOMSON REUTERS ENTERPRISE
7 CENTRE GMBH and WEST
8 PUBLISHING CORPORATION,

9 Plaintiffs and
10 Counter-Defendants,

11 vs.

12 ROSS INTELLIGENCE INC.,

13 Defendant and
14 Counterclaimant.

15 ** HIGHLY CONFIDENTIAL **

16 ** ATTORNEYS' EYES ONLY **

17 REMOTE VIDEOTAPED DEPOSITION OF

18 PETER MARTIN, J.D.

19 Thursday, August 3, 2023

20 8:59 a.m. (CST)

21
22
23 Reported By:

24 Joan Ferrara, RMR, FCRR

25 Job No. 2023-905291

August 3, 2023

8:59 a.m. (CST)

Highly Confidential Videotaped

Deposition of PETER MARTIN, J.D., held
remotely via Zoom, before Joan Ferrara, a
Registered Merit Reporter, Federal
Certified Realtime Reporter and Notary
Public.

REMOTE APPEARANCES:

ON BEHALF OF PLAINTIFFS/COUNTER-DEFENDANTS:

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BY: MAX SAMELS, ESQ.

ON BEHALF OF DEFENDANT/COUNTERCLAIMANT:

CROWELL & MORING LLP

3 Embarcadero Center

26th Floor

San Francisco, California 94111

BY: JACOB CANTER, ESQ.

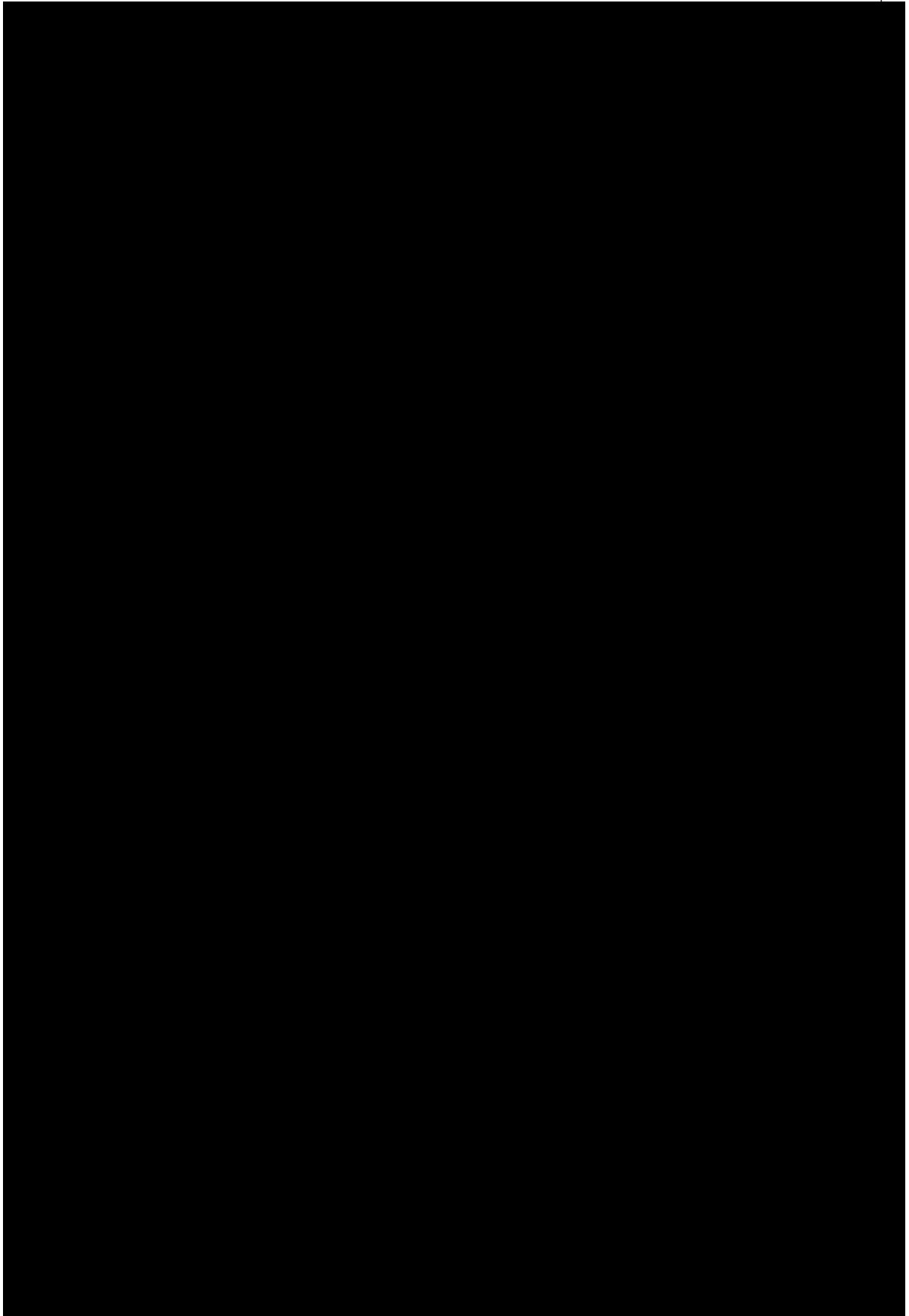
WARRINGTON PARKER, ESQ.

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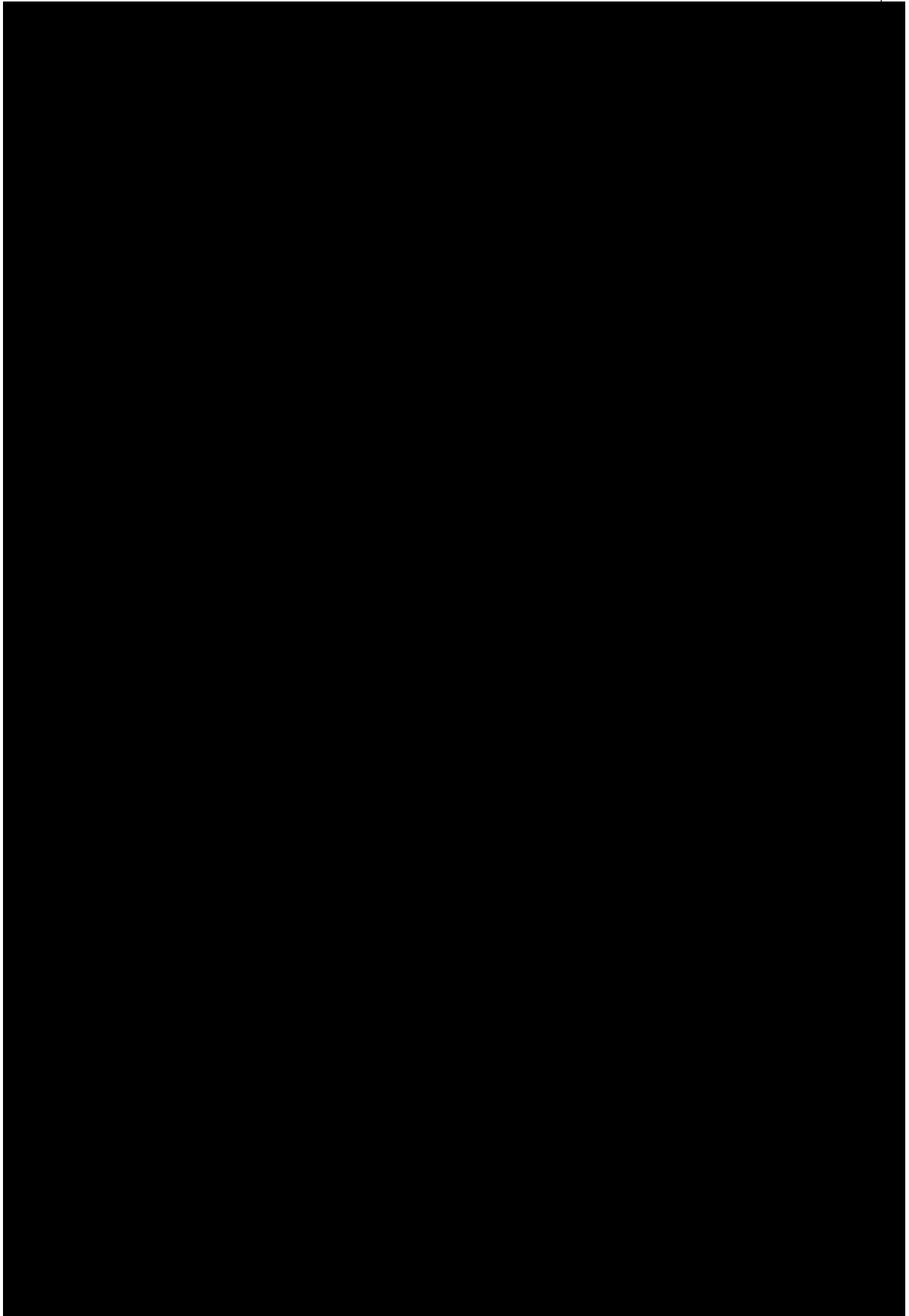
ADRIAN BELTRAN, Videographer

JEREMY YOUNG, Kirkland Tech

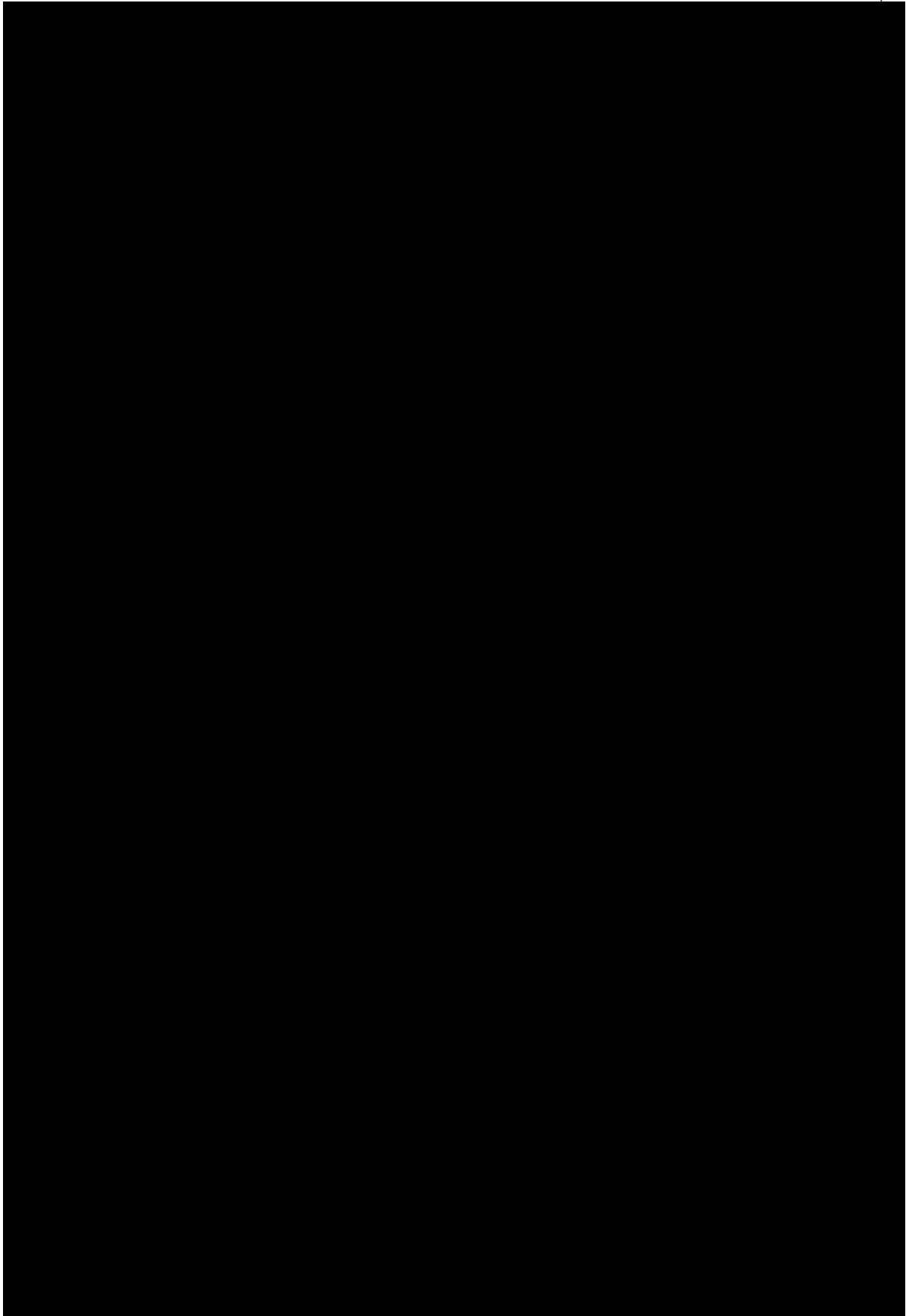
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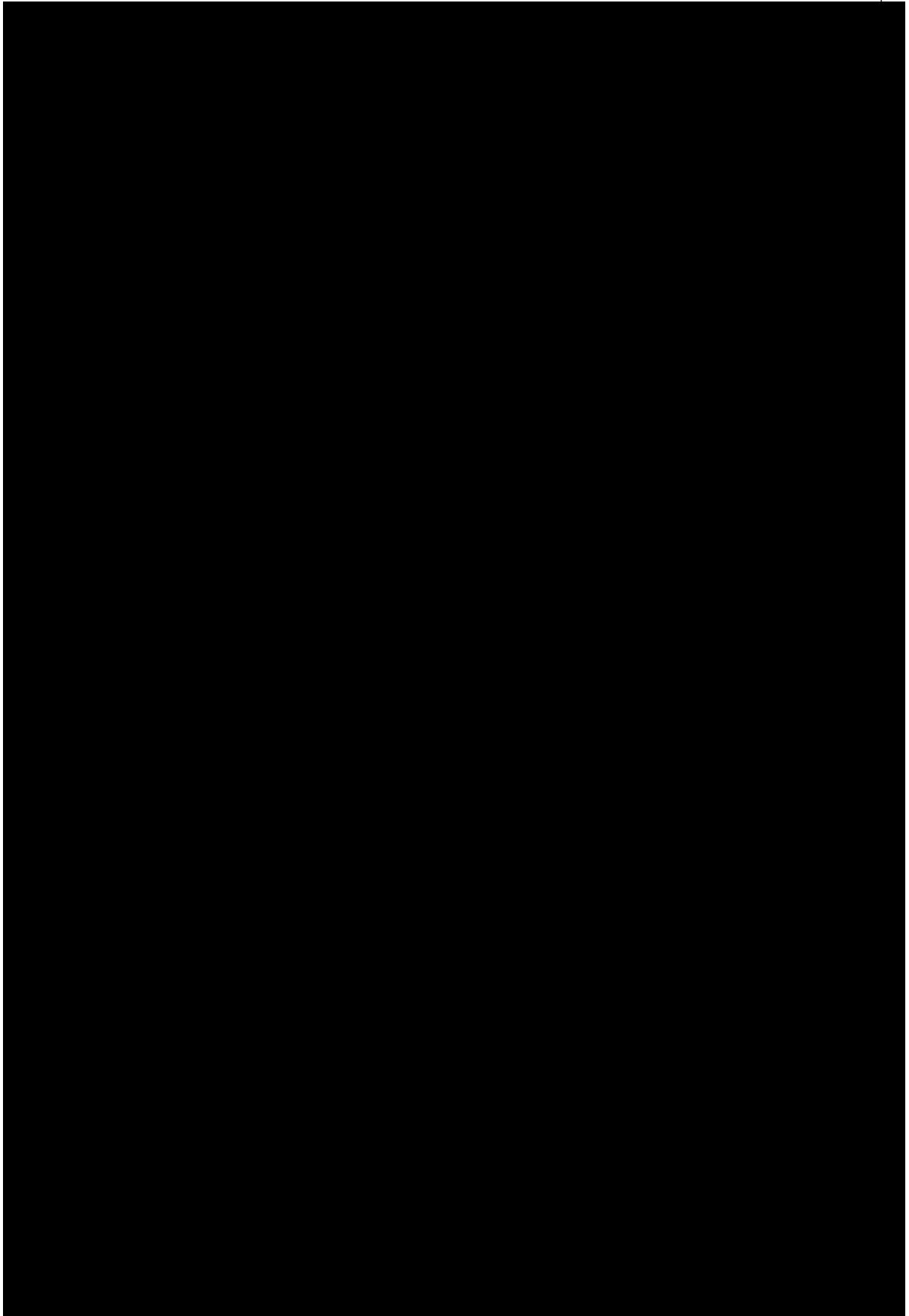
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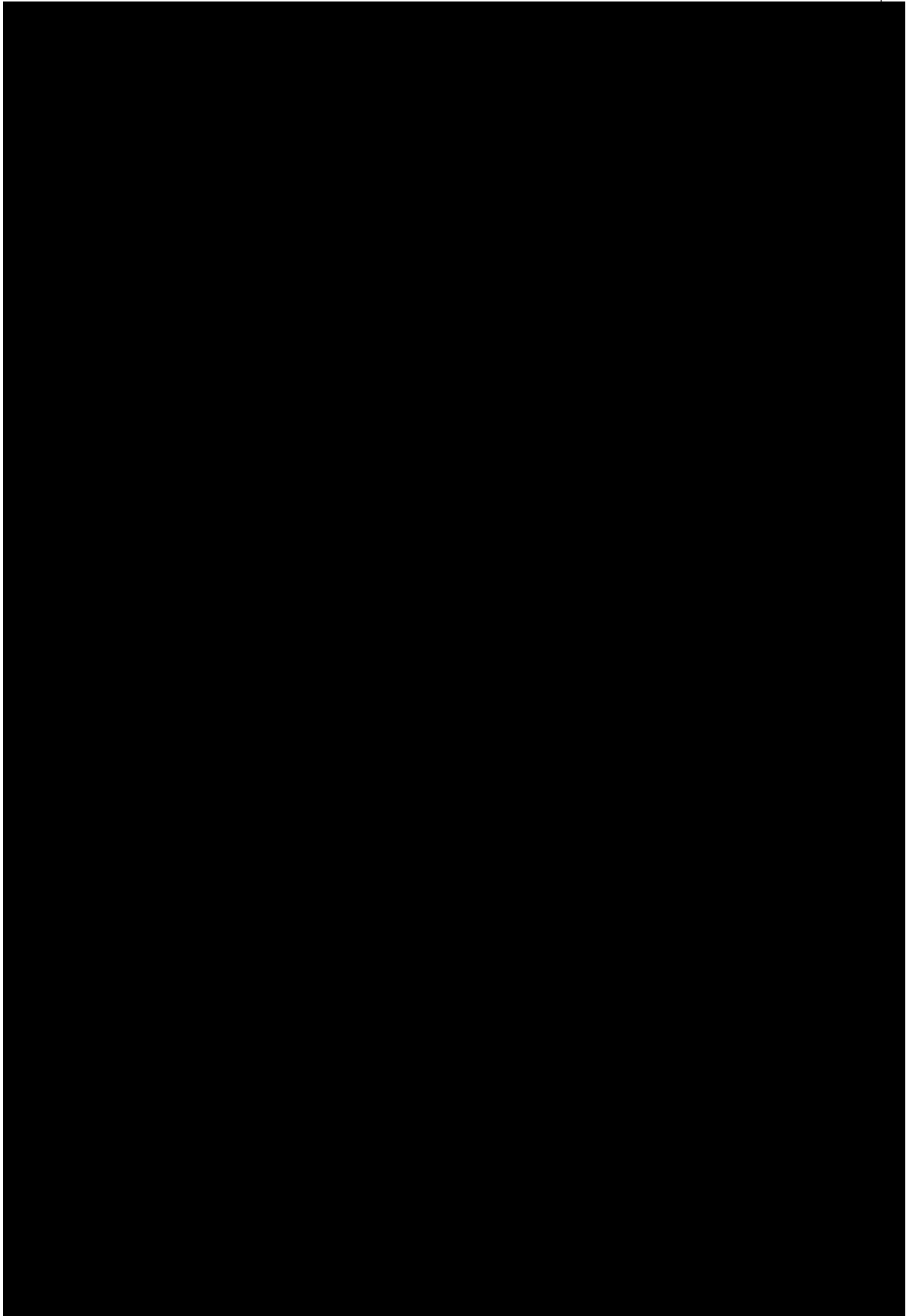
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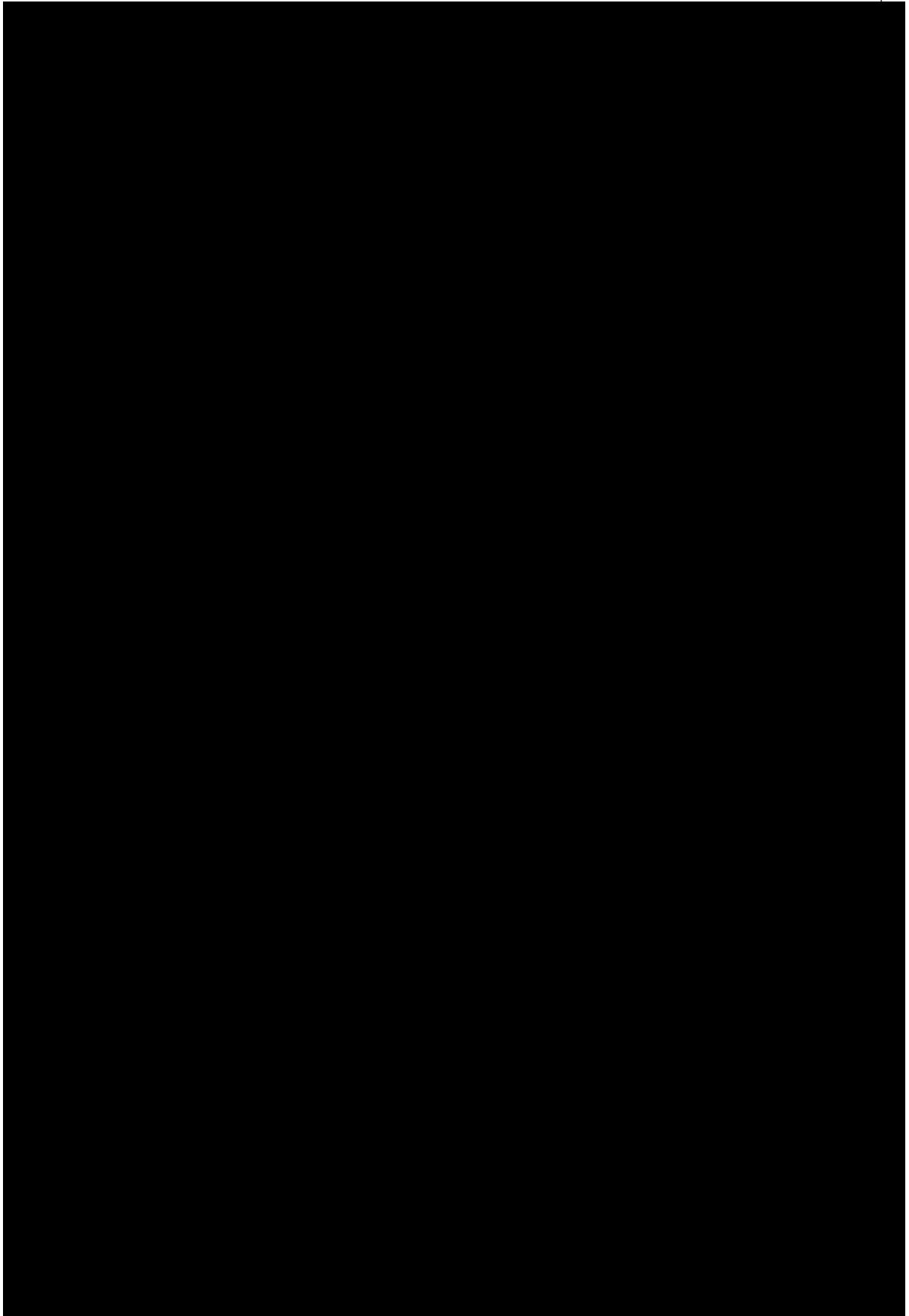
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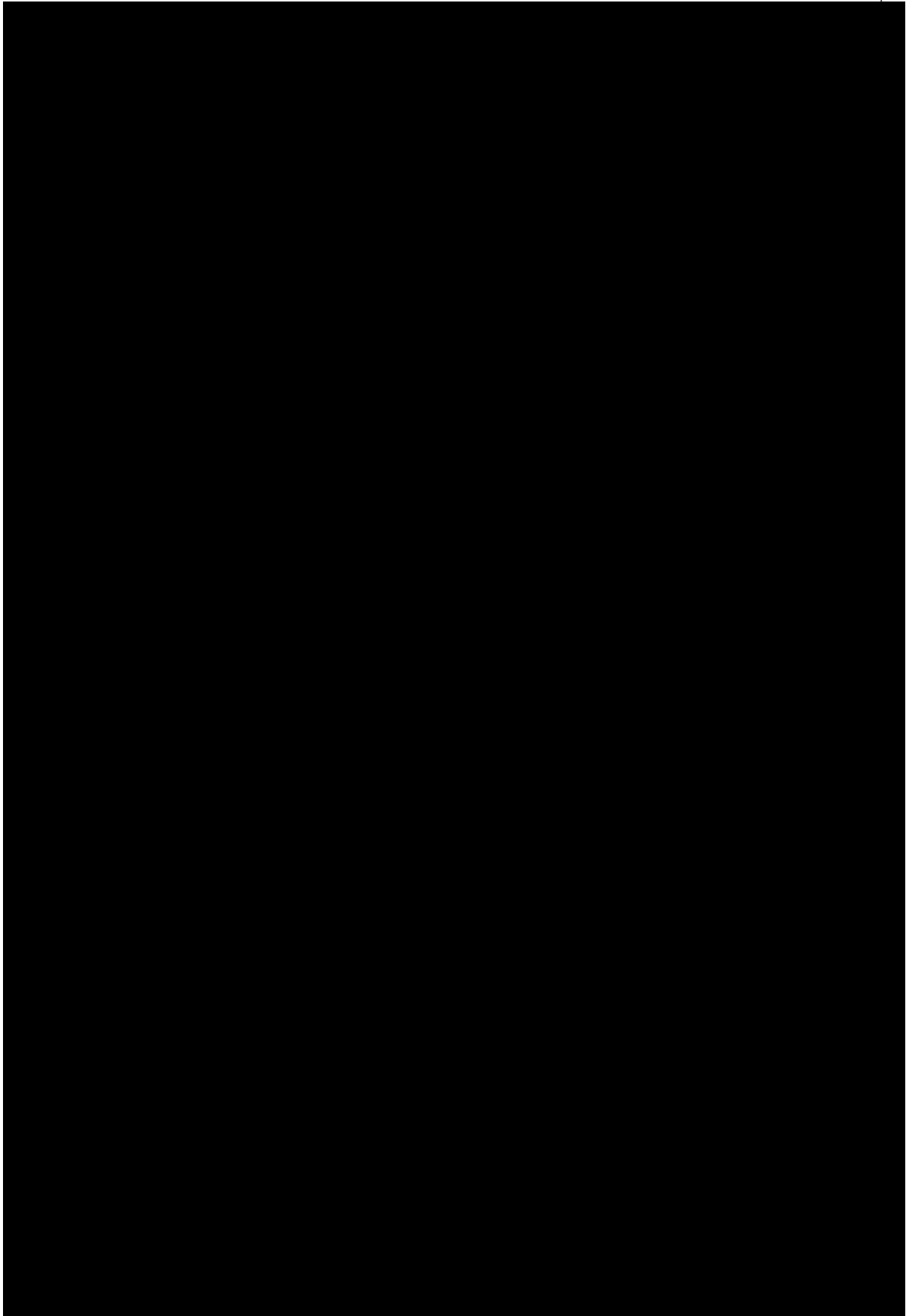
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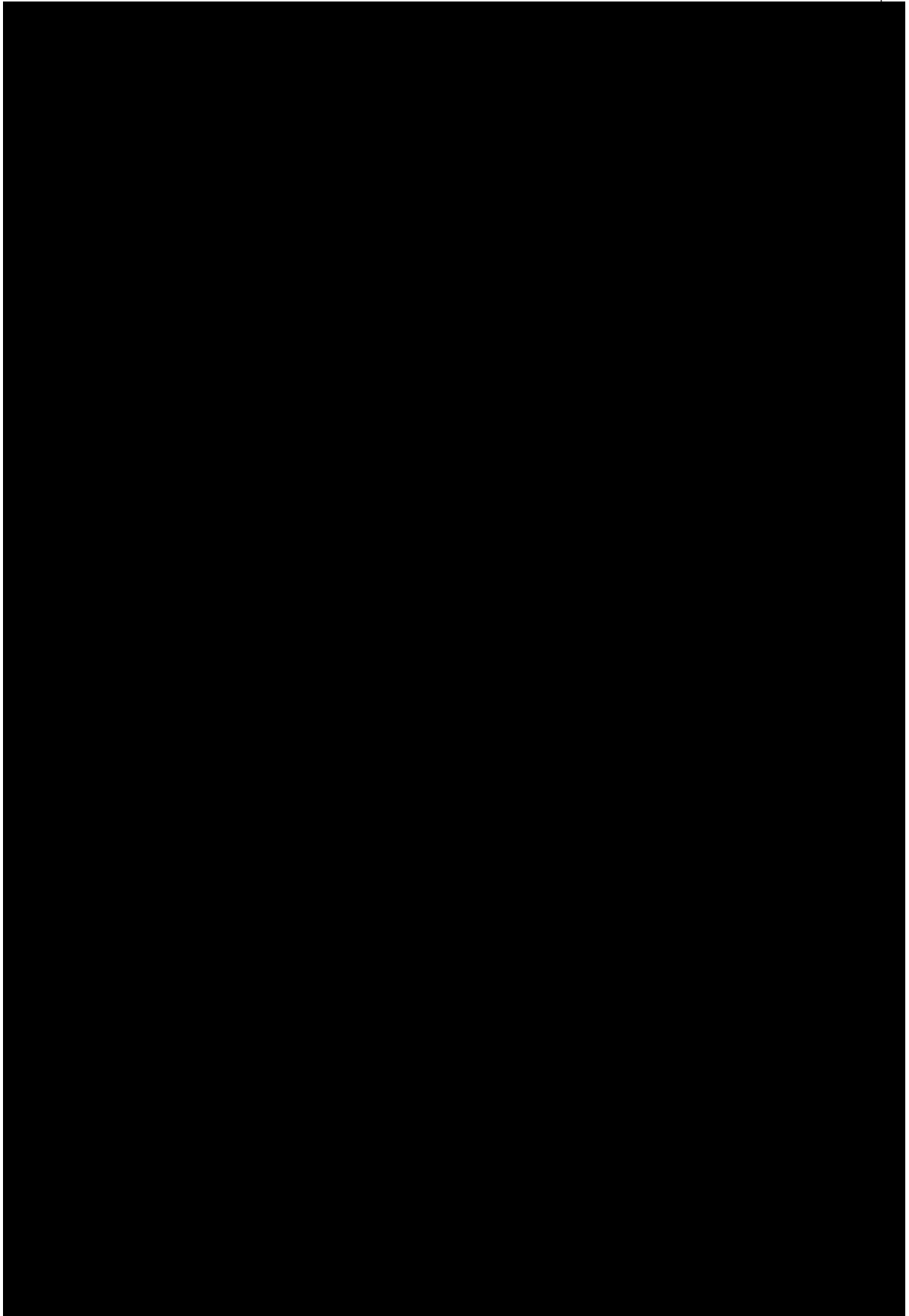


EXHIBIT 109

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE DISTRICT OF DELAWARE

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5 _____
6 THOMSON REUTERS ENTERPRISE)

7 CENTRE GMBH and WEST)

8 PUBLISHING CORPORATION,)

9 Plaintiffs and) C.A. No. 20-613

10 Counterdefendants) (LPS)

11 v.)

12 ROSS INTELLIGENCE, INC.,) HIGHLY CONFIDENTIAL

13 Defendant and)

14 Counterclaimant.)

15 _____)
16

17 --- This is the transcript of the videotaped
18 Deposition of, JIMOH OVBIAGELE, taken at the
19 offices of Regus - Toronto Airport Corporate
20 Centre, Mississauga, Ontario, Canada, on the
21 12th day of April, 2022.

22 -----
23

24 REPORTED BY: Helen Martineau, CSR

25 VIDEOGRAPHER: Bruno Silva

1 A P P E A R A N C E S:

2 FOR THE PLAINTIFF:

3 KIRKLAND & ELLIS LLP

4 PER: Joshua L. Simmons, Esq.

5 & Eric Loverro, Esq.

6 601 Lexington Avenue

7 New York, New York

8 Tel. (212) 446-4989

9 Email: joshua.simmons@kirkland.com

10 eric.loverro@kirkland.com

11

12 FOR THE DEFENDANT:

13 CROWELL & MORING LLP

14 PER: Warrington Parker, Esq.

15 & Jacob Canter, Esq.

16 3 Embarcadero Center, 26th Floor

17 San Francisco, California

18 94111

19 Tel. (415) 365-7234

20 Email: wparker@crowell.com

21 jcanter@crowell.com

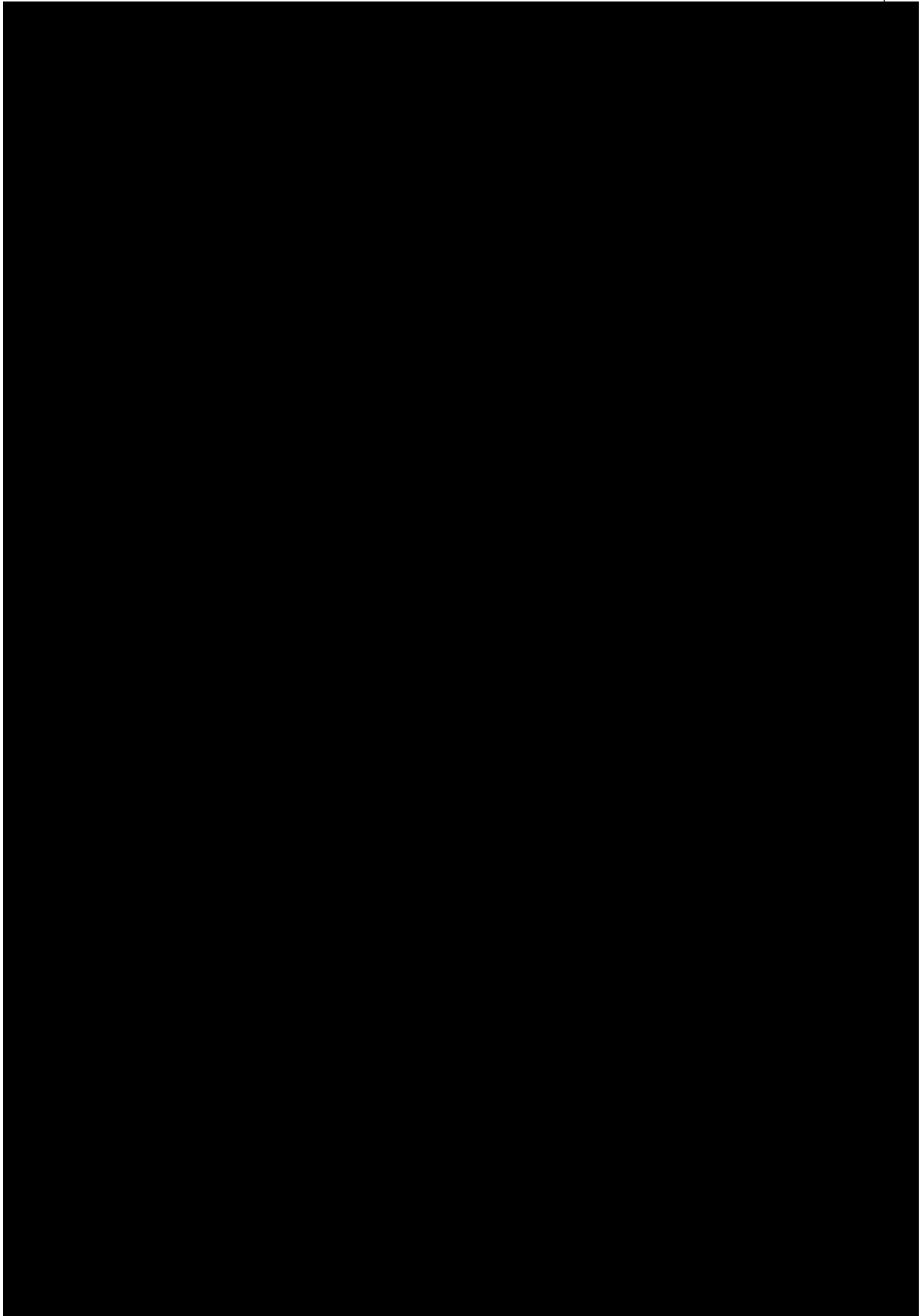
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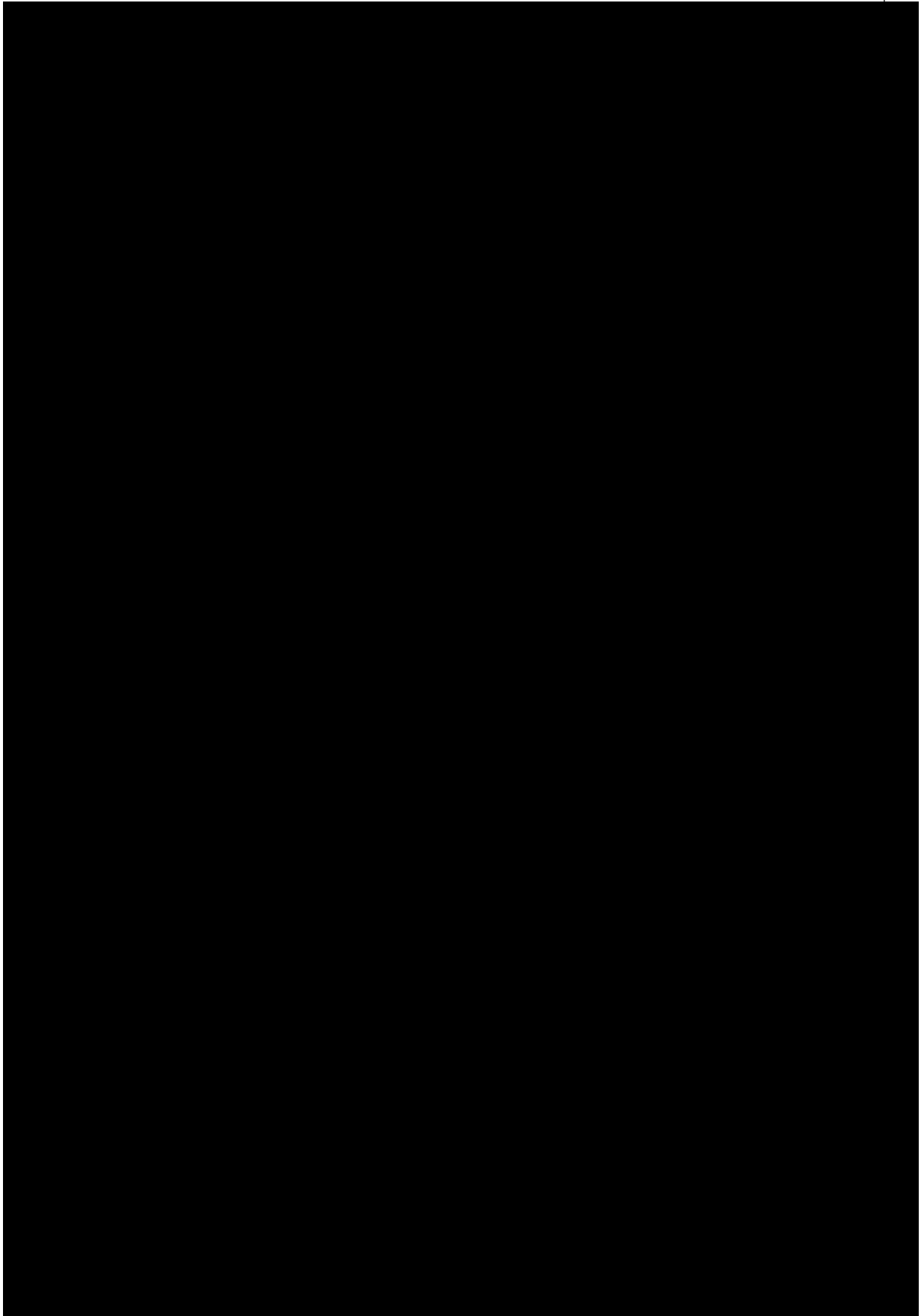
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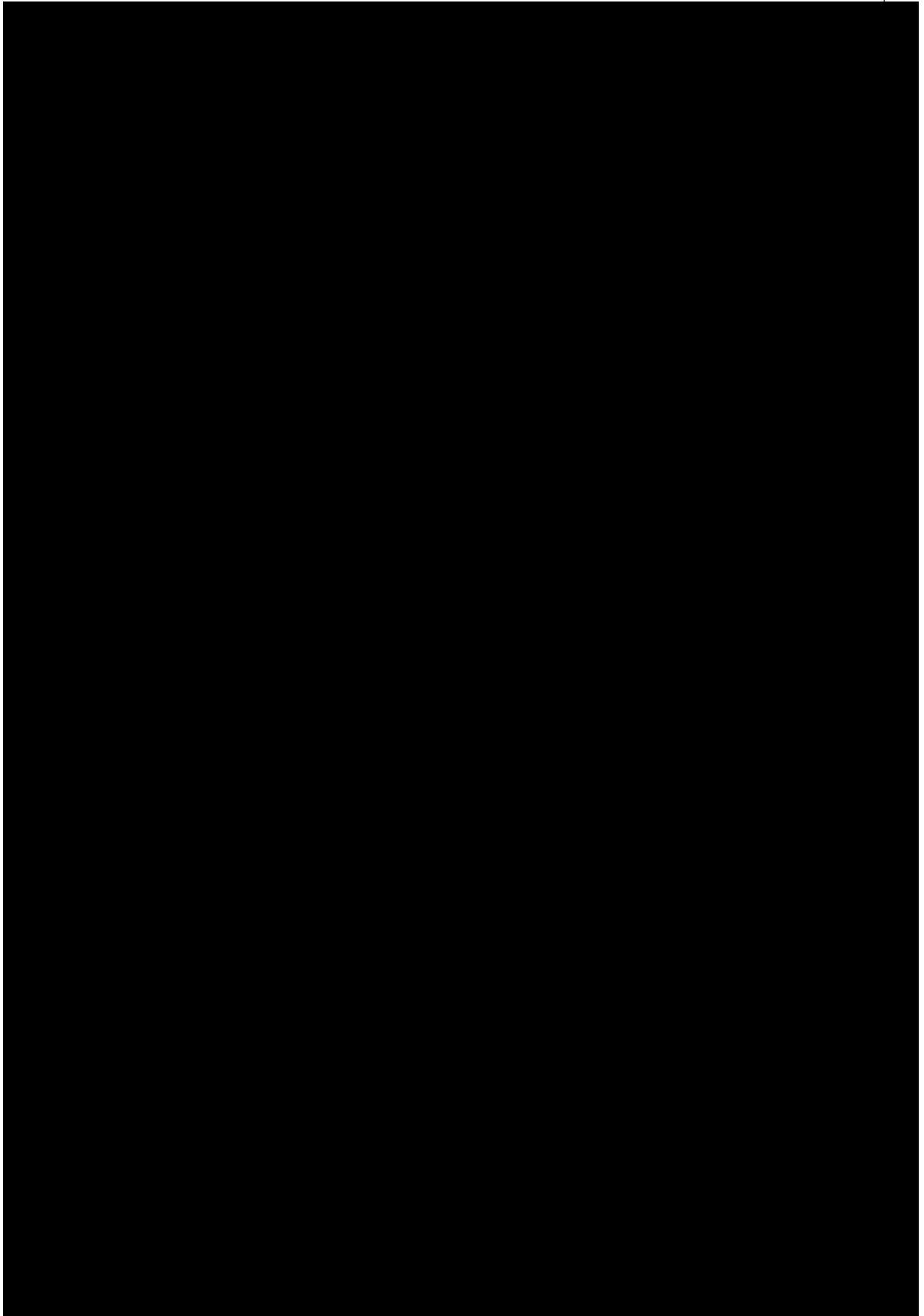
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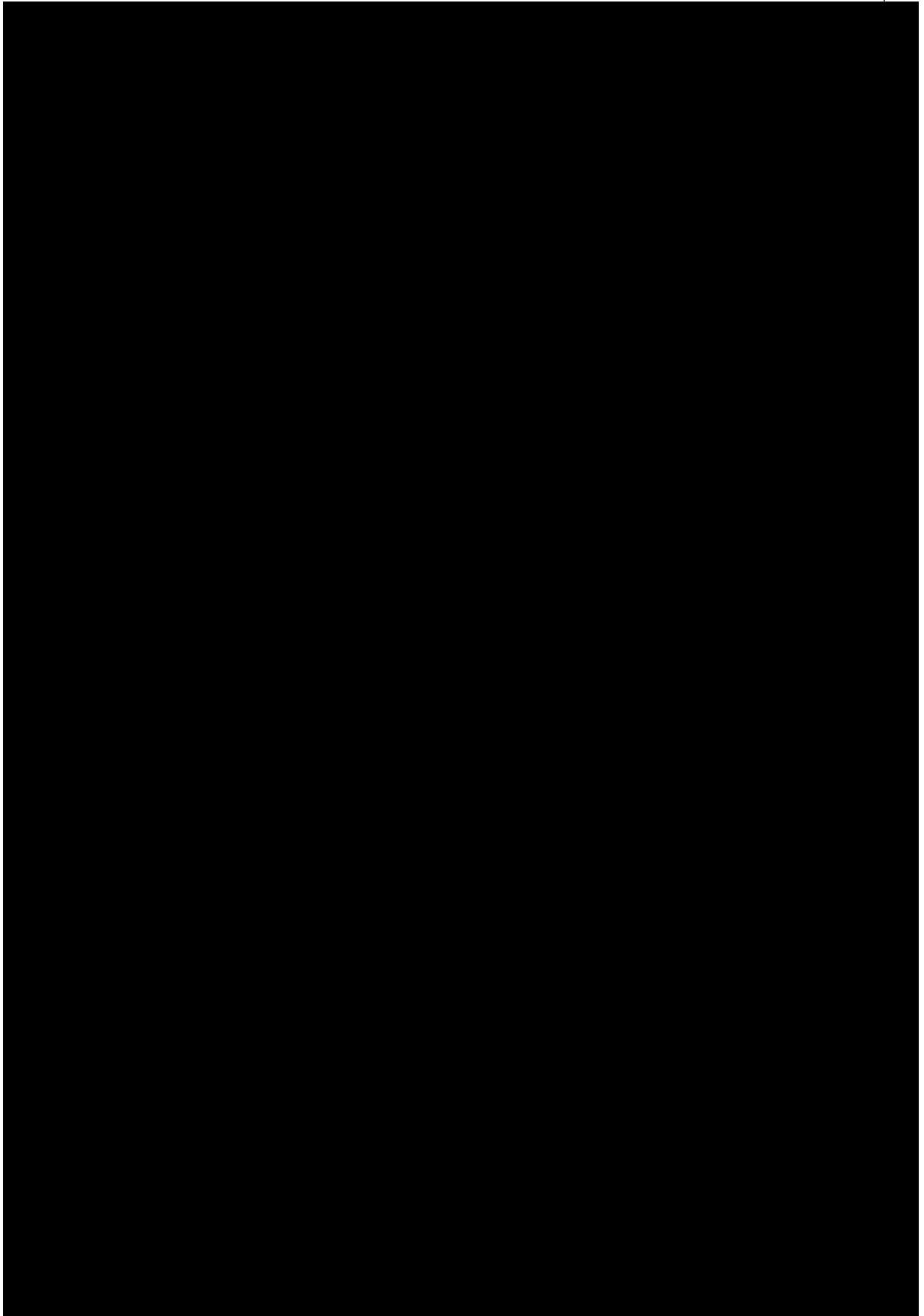


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2 IN THE UNITED STATES DISTRICT COURT
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12 ROSS INTELLIGENCE INC.,

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14 Counterclaimant.
15 -----

16 ** HIGHLY CONFIDENTIAL **

17 ** ATTORNEYS' EYES ONLY **

18 REMOTE VIDEOTAPED DEPOSITION OF

19 JIMOH OVBIAGELE

20 Tuesday, May 2, 2023

21 8:02 a.m. (CST)

22
23 Reported By:

24 Joan Ferrara, RMR, FCRR

25 Job No. 2023-892413

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May 2, 2023

8:02 a.m. (CST)

Videotaped Deposition of JIMOH
OVBIAGELE, held remotely via Zoom, before
Joan Ferrara, a Registered Merit Reporter,
Federal Certified Realtime Reporter and
Notary Public.

REMOTE APPEARANCES:

ON BEHALF OF PLAINTIFFS/COUNTER-DEFENDANTS:

KIRKLAND & ELLIS LLP

200 Clarendon Street

Boston, Massachusetts 02116

BY: DANIEL LAYTIN, ESQ.

ON BEHALF OF DEFENDANT/COUNTERCLAIMANT:

CROWELL & MORING LLP

3 Embarcadero Center

26th Floor

San Francisco, California 94111

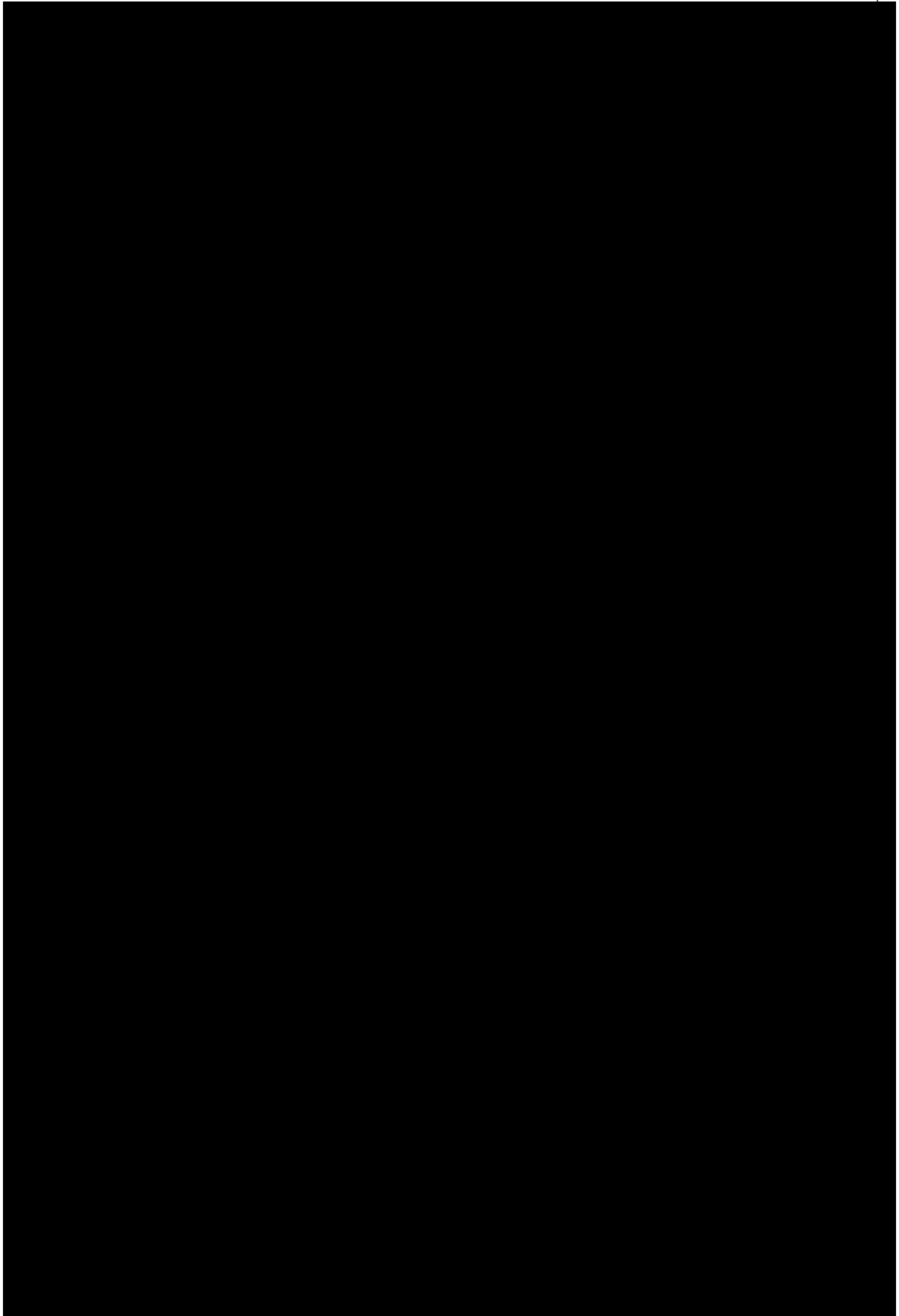
BY: WARRINGTON PARKER, ESQ.

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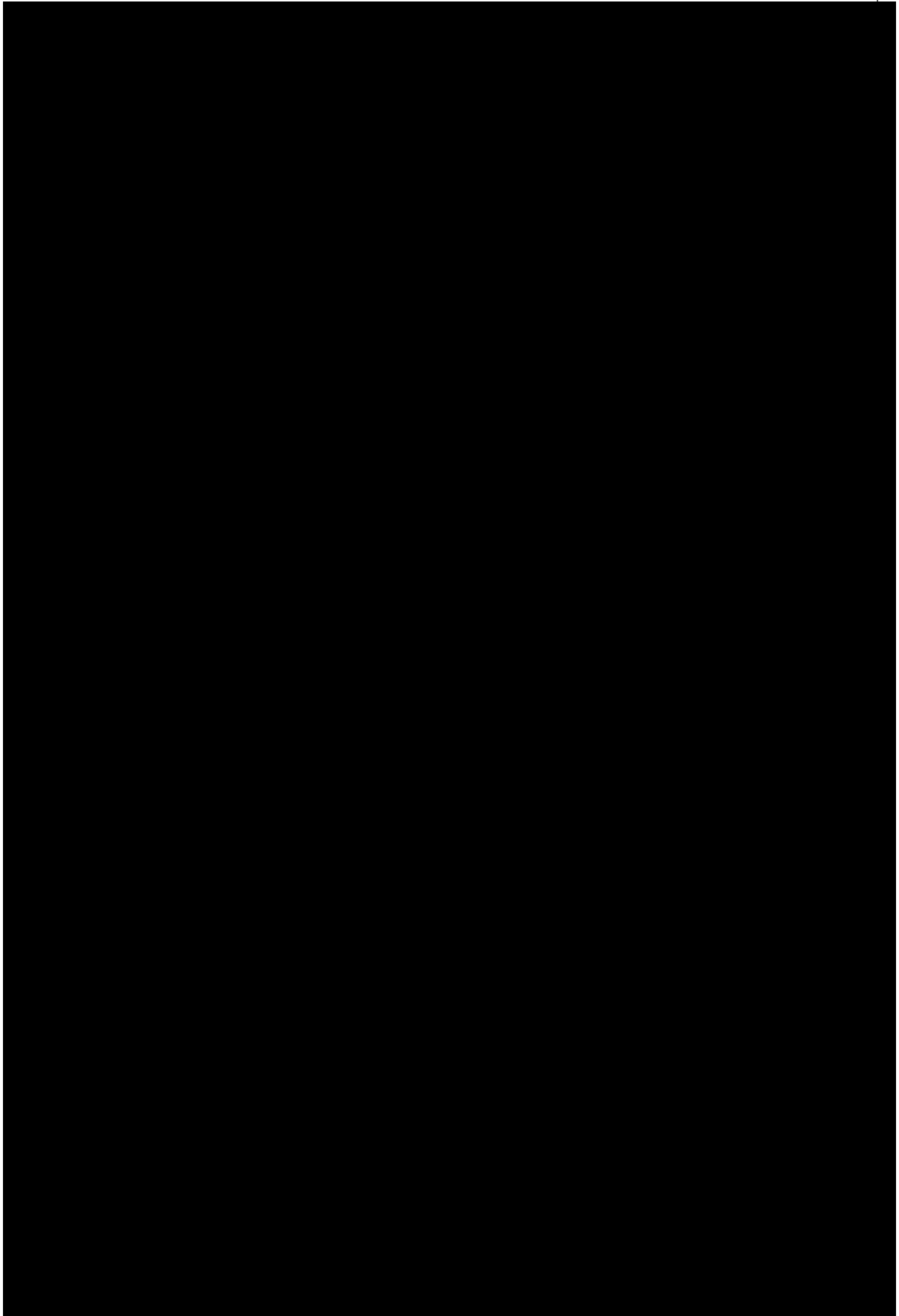
LARRY GRISBY, Videographer

JOSE LOPEZ, Kirkland Tech

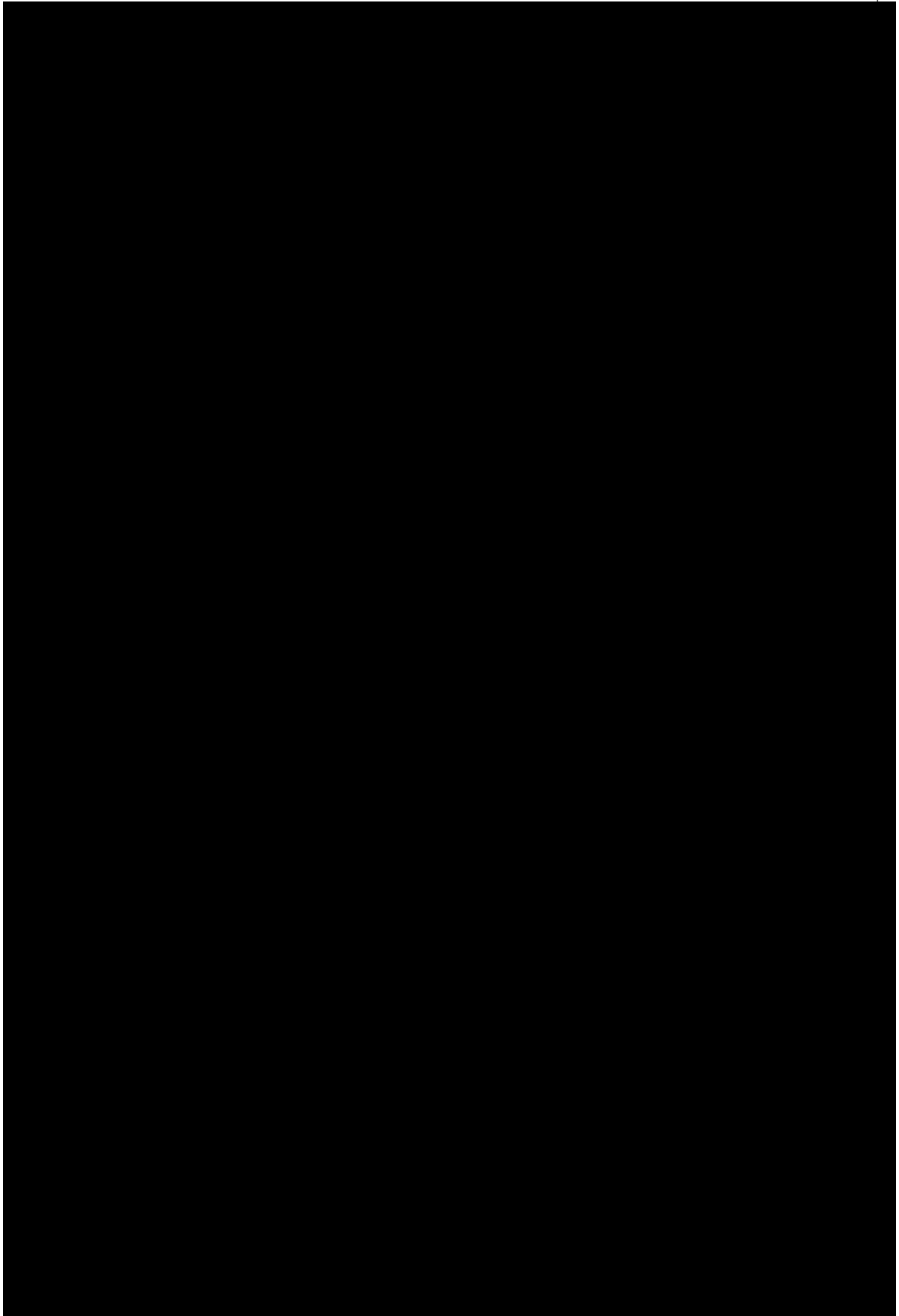
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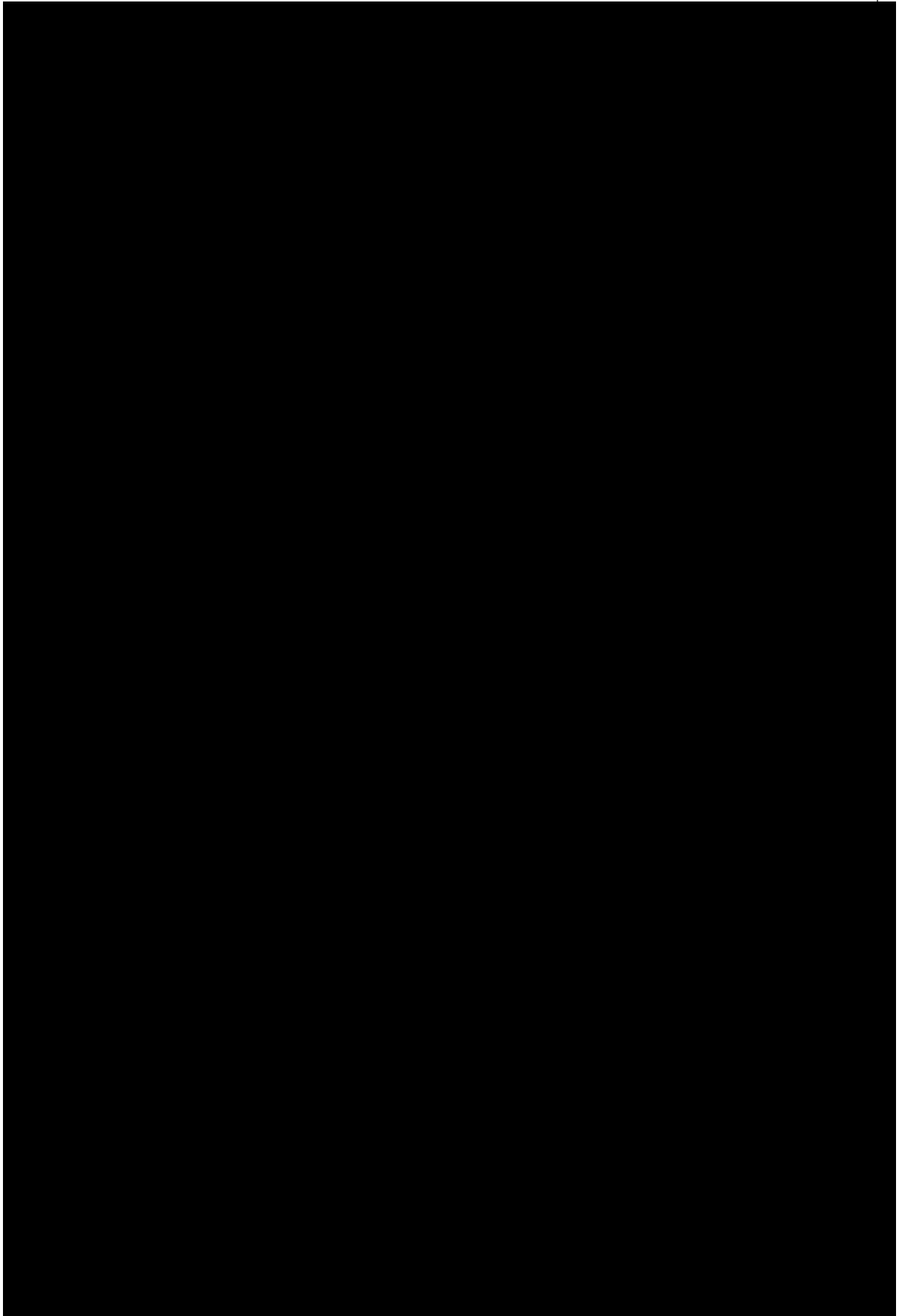


EXHIBIT 111

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2 IN THE UNITED STATES DISTRICT COURT
3 FOR THE DISTRICT OF DELAWARE

4 -----X

5 THOMSON REUTERS ENTERPRISE CENTRE GMBH and
6 WEST PUBLISHING CORPORATION,

7 Plaintiffs,

8 v.

9 ROSS INTELLIGENCE INC.,

10 Defendant.

11 -----X

12 ***HIGHLY CONFIDENTIAL***

13

14 VIDEOTAPED DEPOSITION OF JIM RATLIFF

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18 DATE: July 28, 2023

19 TIME: 9:40 a.m. Central

20 PLACE: ***REMOTE***

21 BEFORE: Rebecca Schaumloffel, RPR, CCR-NJ

22 JOB NO: 2023-905290

23

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25

A P P E A R A N C E S :

KIRKLAND & ELLIS LLP
Attorneys for the Plaintiff
601 Lexington Avenue
New York, New York 10022
BY: CHRISTA COTTRELL, ESQ.
LEXI WUNG, ESQ.

CROWELL & MORING LLP
Attorneys for the Defendant
3 Embarcadero Center
San Francisco, California 94111
BY: MATT MCBURNEY, ESQ.
CRINESHA BERRY, ESQ.
BEATRICE NGUYEN, ESQ.

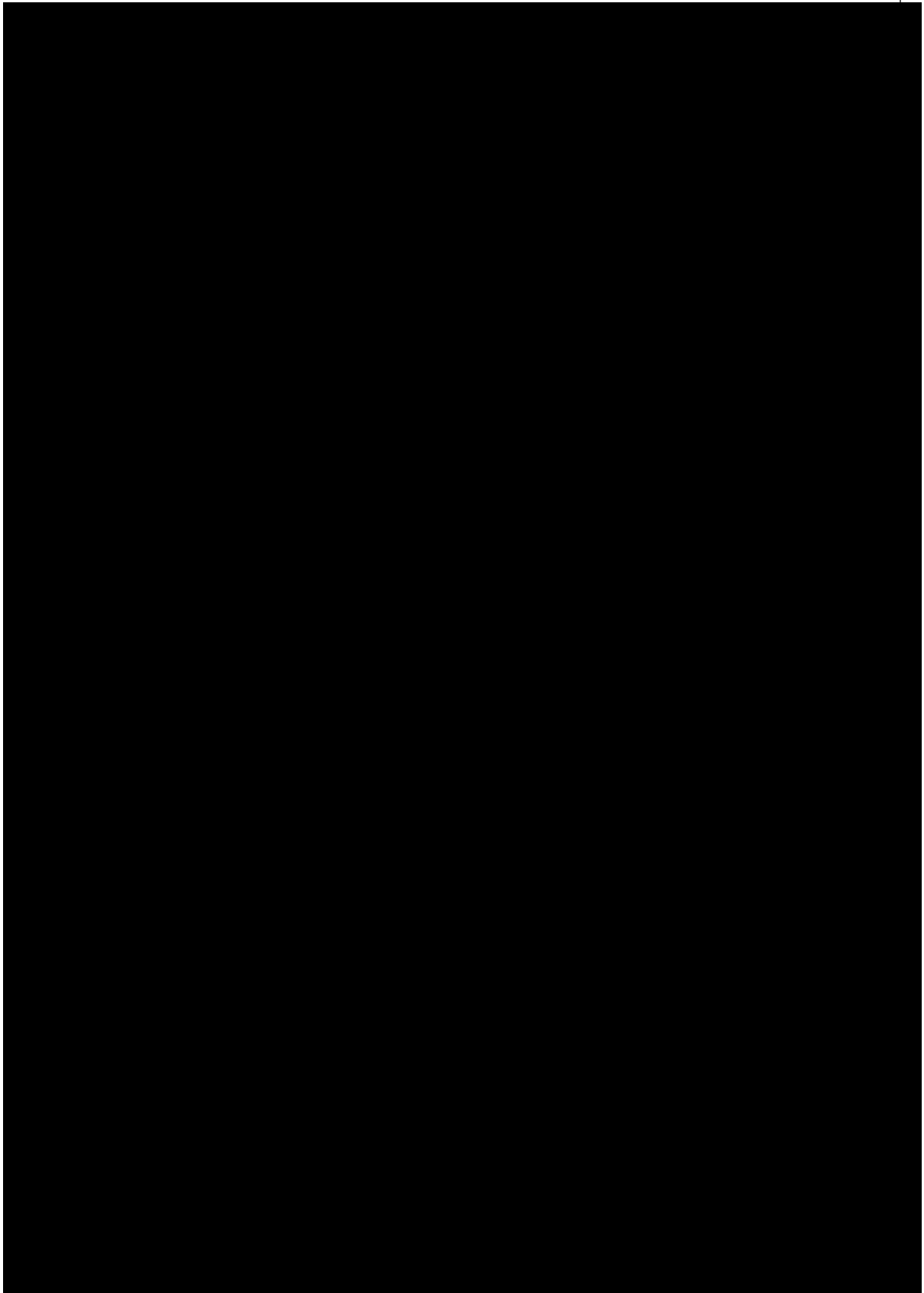
ALSO PRESENT:

Roman Bielski, Kirkland
Joshua Clarke, Lexitas

* * *

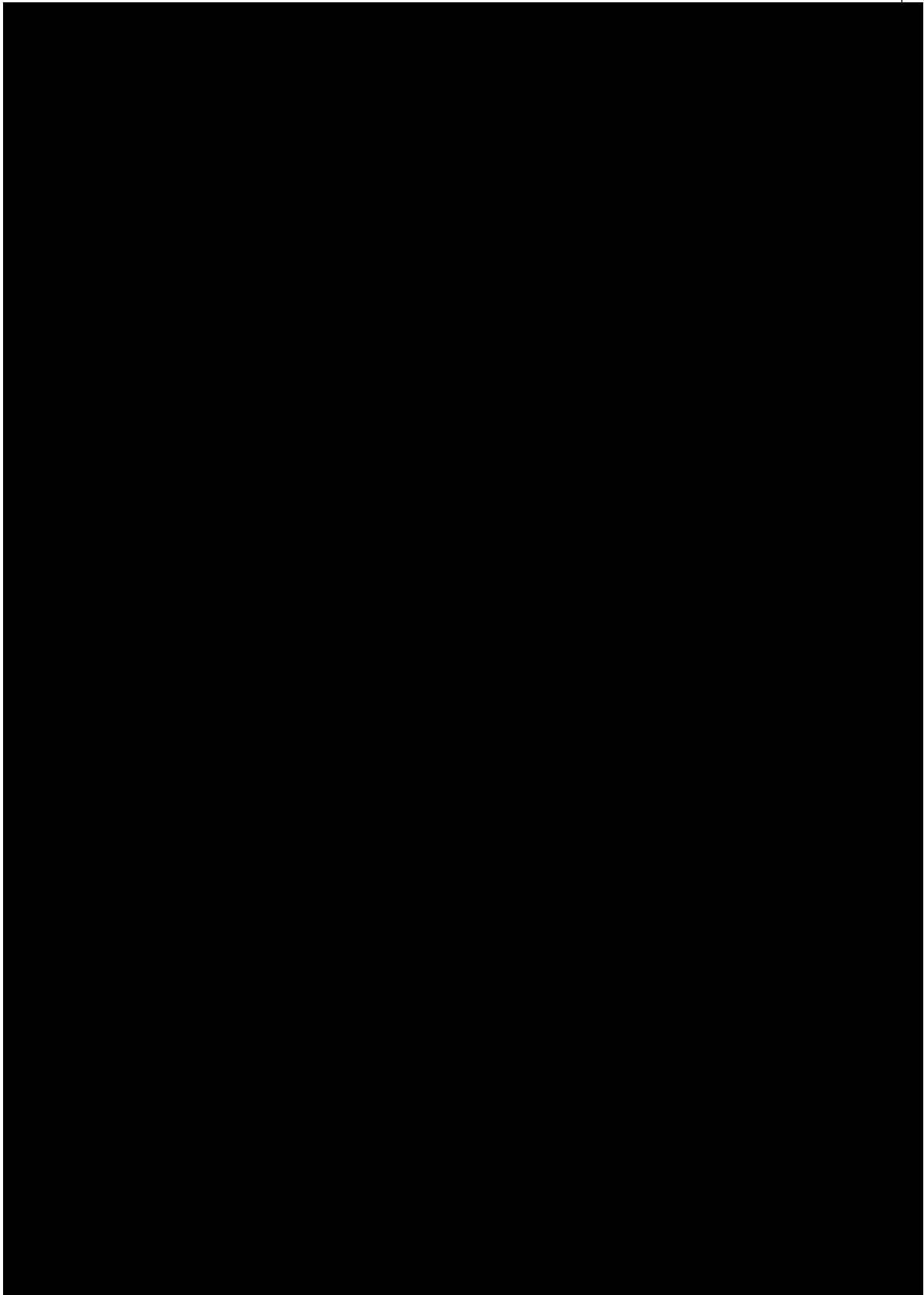
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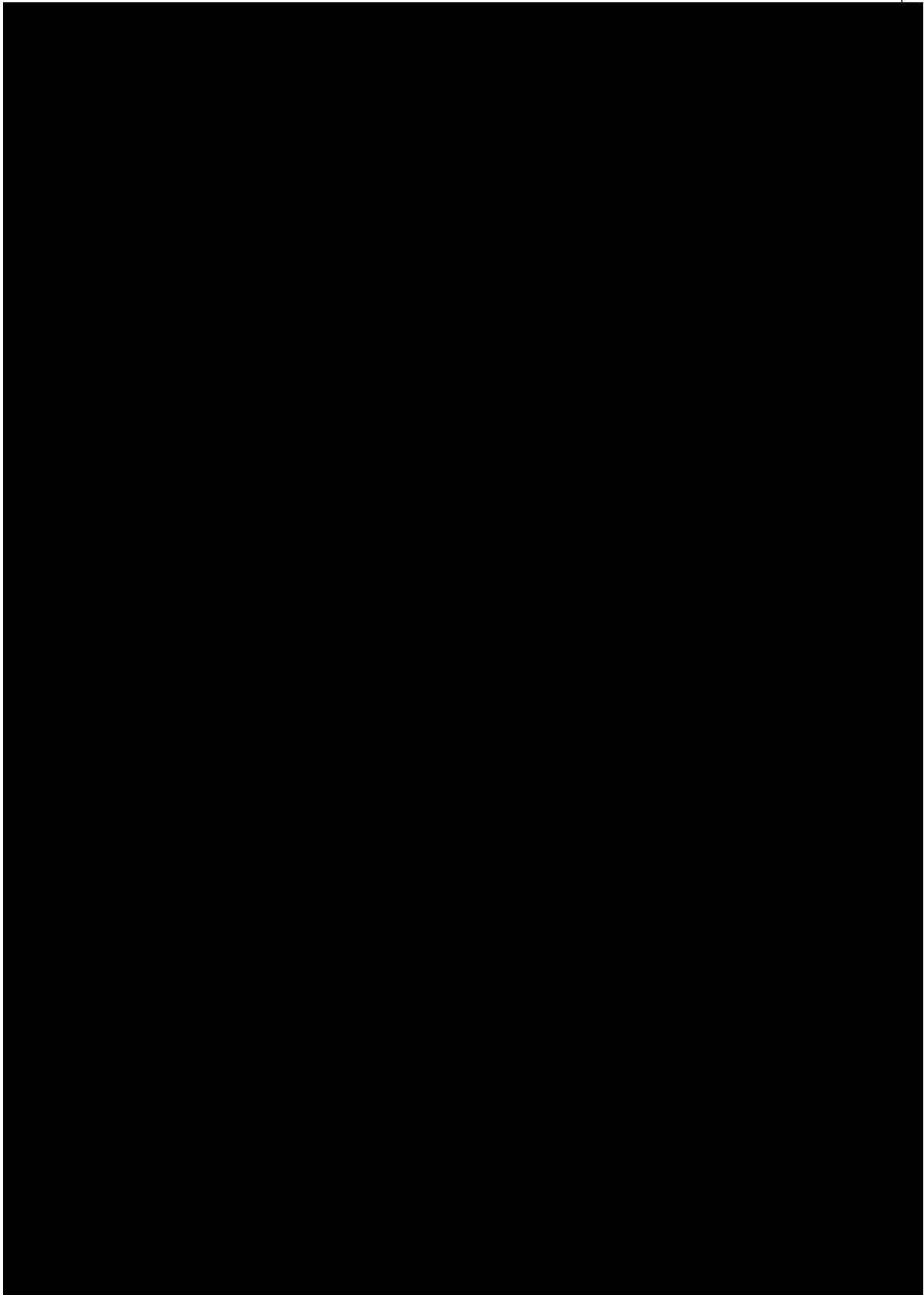
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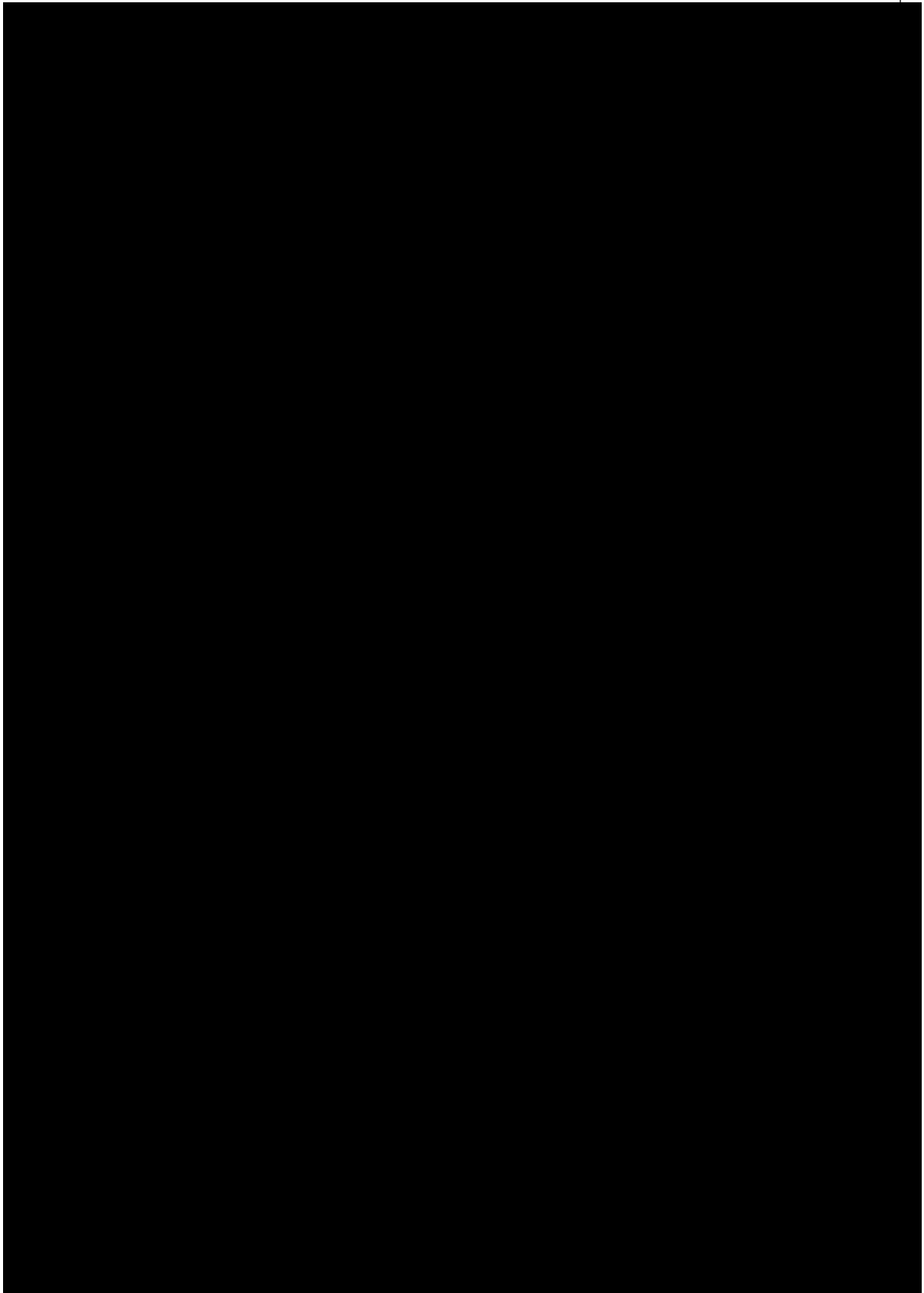


EXHIBIT 112

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF DELAWARE

IN RE MATTER OF:)
)
THOMSON REUTERS ENTERPRISE)
CENTRE GMBH and WEST)
PUBLISHING CORPORATION,)
)
Plaintiffs and)
Counterdefendants,)
)
vs.) C.A. No. 20-613(LPS)
)
ROSS INTELLIGENCE INC.,)
)
Defendant and)
Counterclaimant.)
)

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

VIDEOTAPED DEPOSITION OF SEAN O. SHAFIK

LOS ANGELES, CALIFORNIA

Friday, April 22, 2022

Stenographically Reported by:

HEATHER J. BAUTISTA, CSR, CRR, RPR, CLR
Realtime Systems Administrator
California CSR License #11600
Oregon CSR License #21-0005
Washington License #21009491
Nevada CCR License #980
Texas CSR License #10725

Job No.: 2022-836111

2

VIDEOTAPED DEPOSITION of SEAN O. SHAFIK, taken
before Heather J. Bautista, CSR No. 11600, a Certified
Shorthand Reporter for the state of California, with
principal office in the county of Santa Clara,
commencing on Friday, April 22, 2022, 10:02 a.m., at
2049 Century Park East, Suite 3700, Los Angeles,
California 90067.

APPEARANCES OF COUNSEL:

For Plaintiffs and Counterdefendants:

Kirkland & Ellis LLP
BY: MIRANDA D. MEANS, ESQ.
ROMA LOPES, ESQ.
200 Clarendon Street
Boston, Massachusetts 02116
Phone: (617) 385-7500
miranda.means@kirkland.com

For Defendant and Counterclaimant:

Crowell & Moring LLP
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3 Embarcadero Center
26th Floor
San Francisco, California 94111
Phone: (415) 365-7461
jsteinberg@crowell.com

ALSO PRESENT: Saxon Christin, Videographer

3

INDEX OF EXAMINATION

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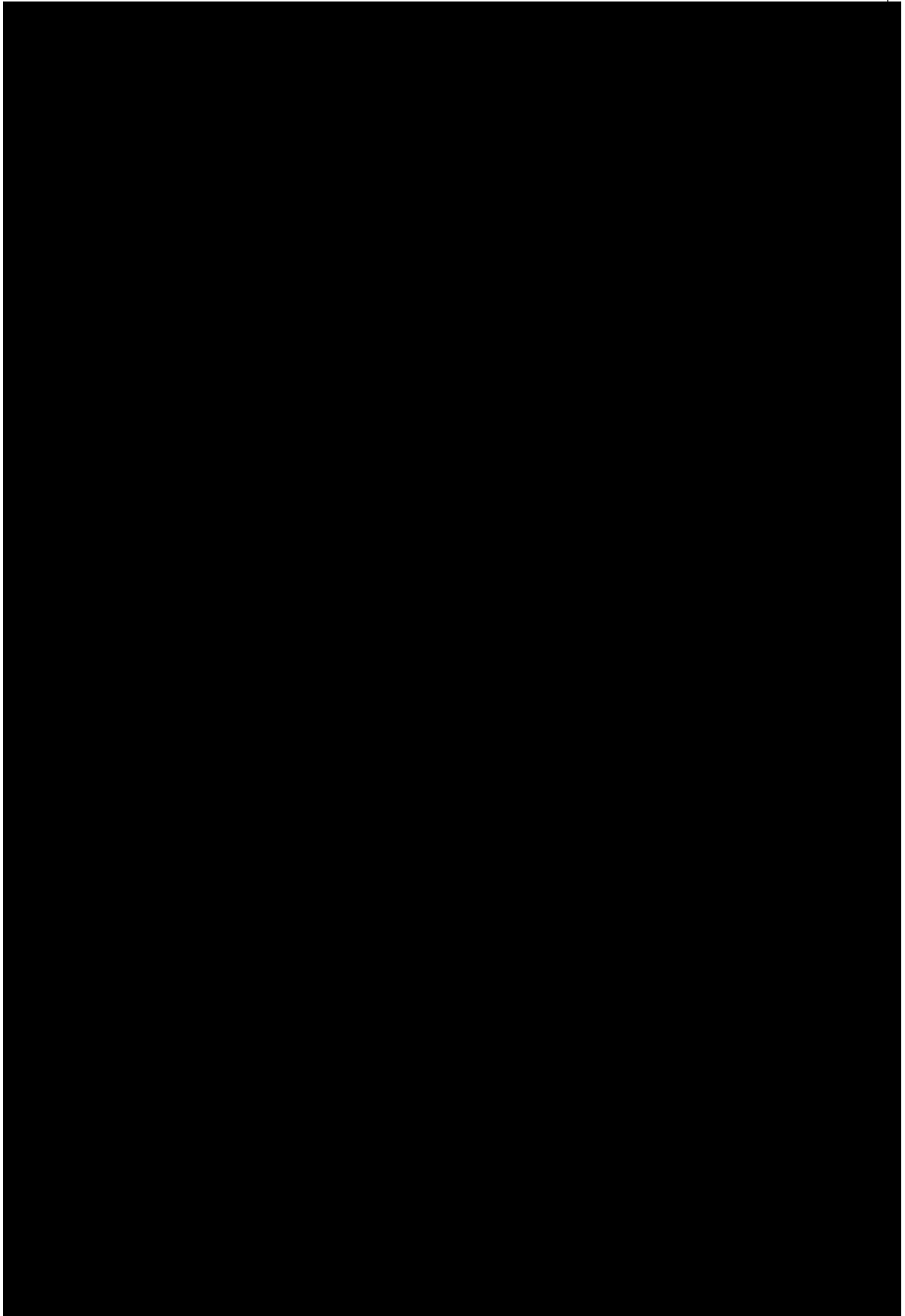
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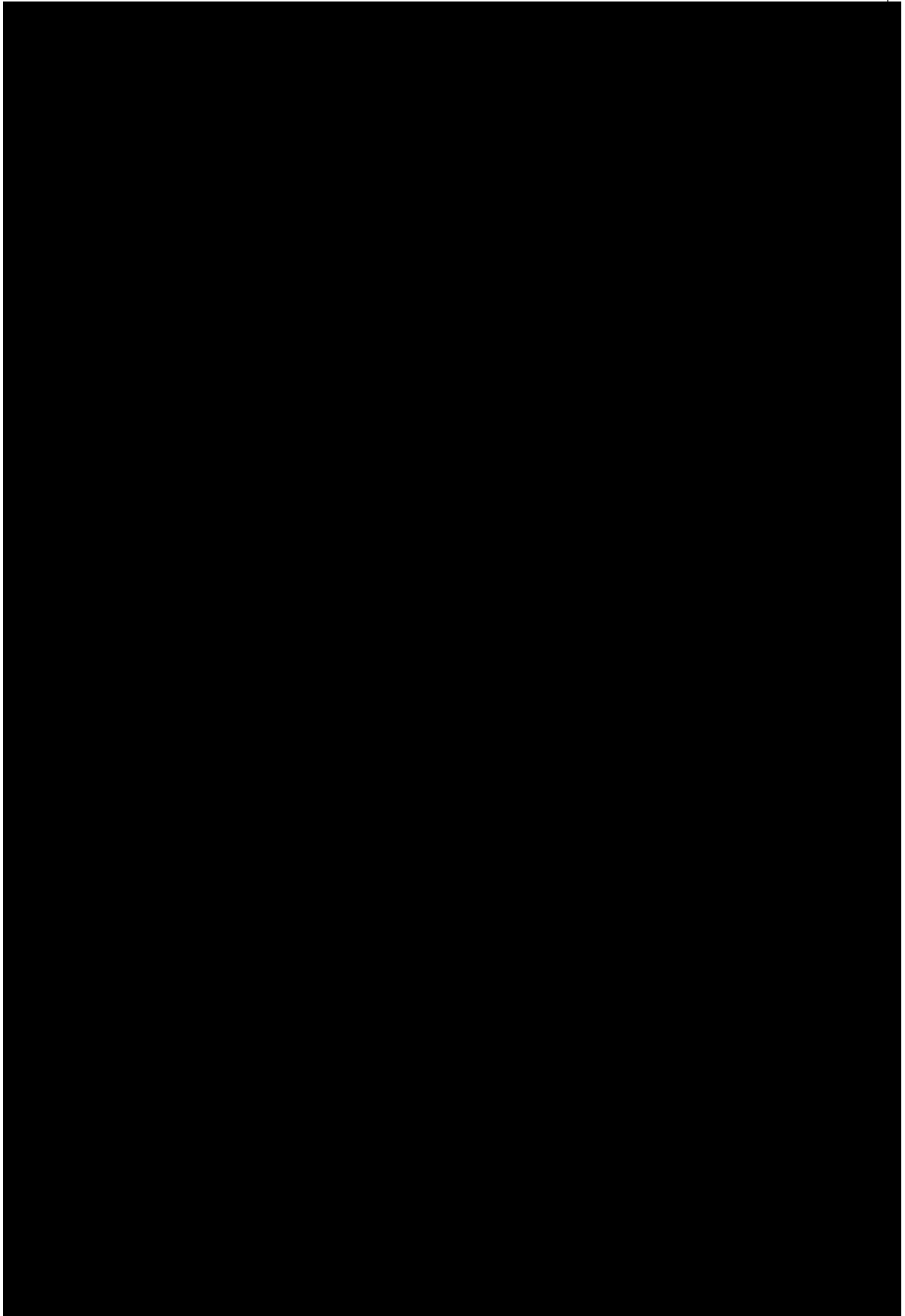
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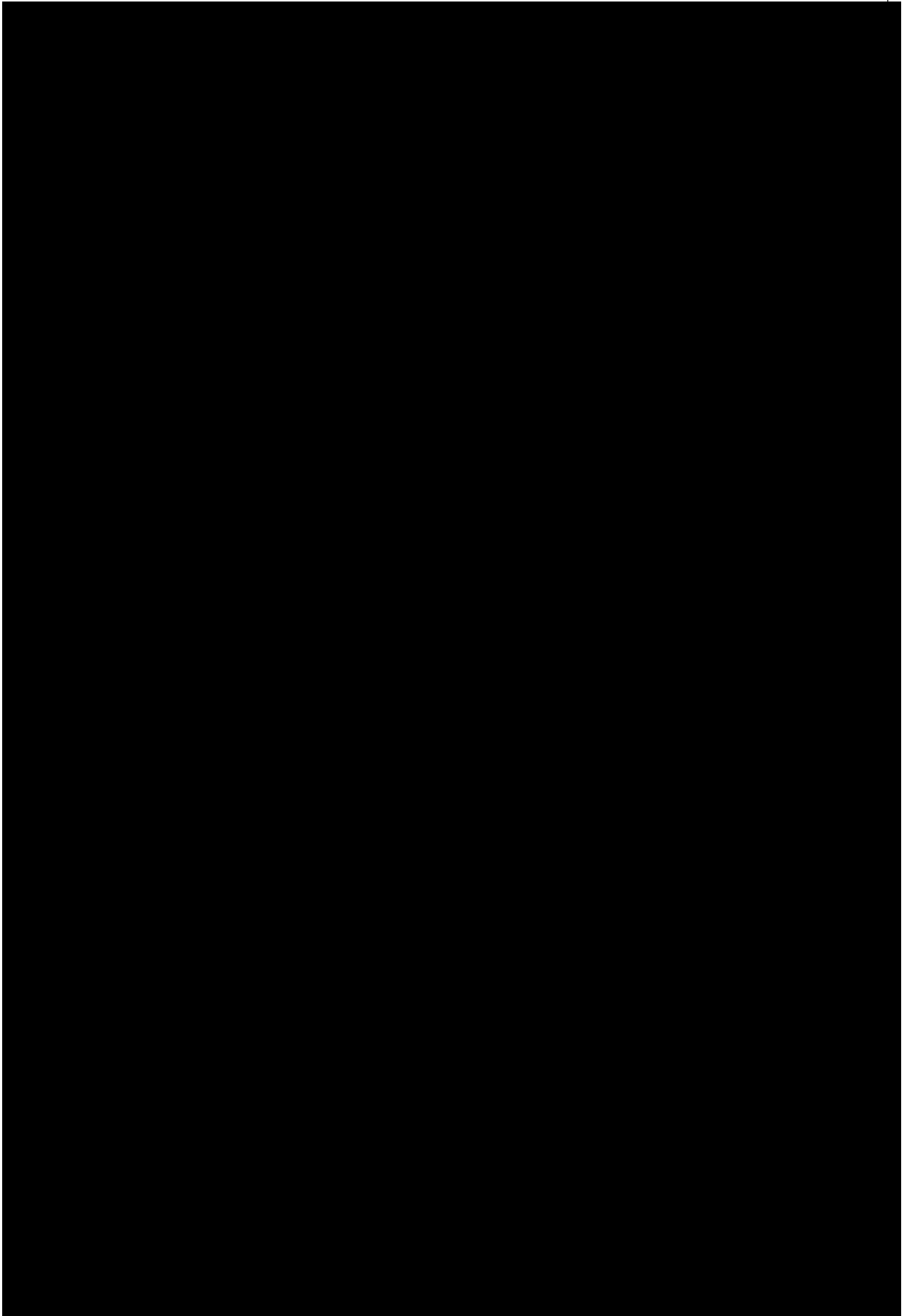
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EXAMINATION BY MR. STEINBERG

169







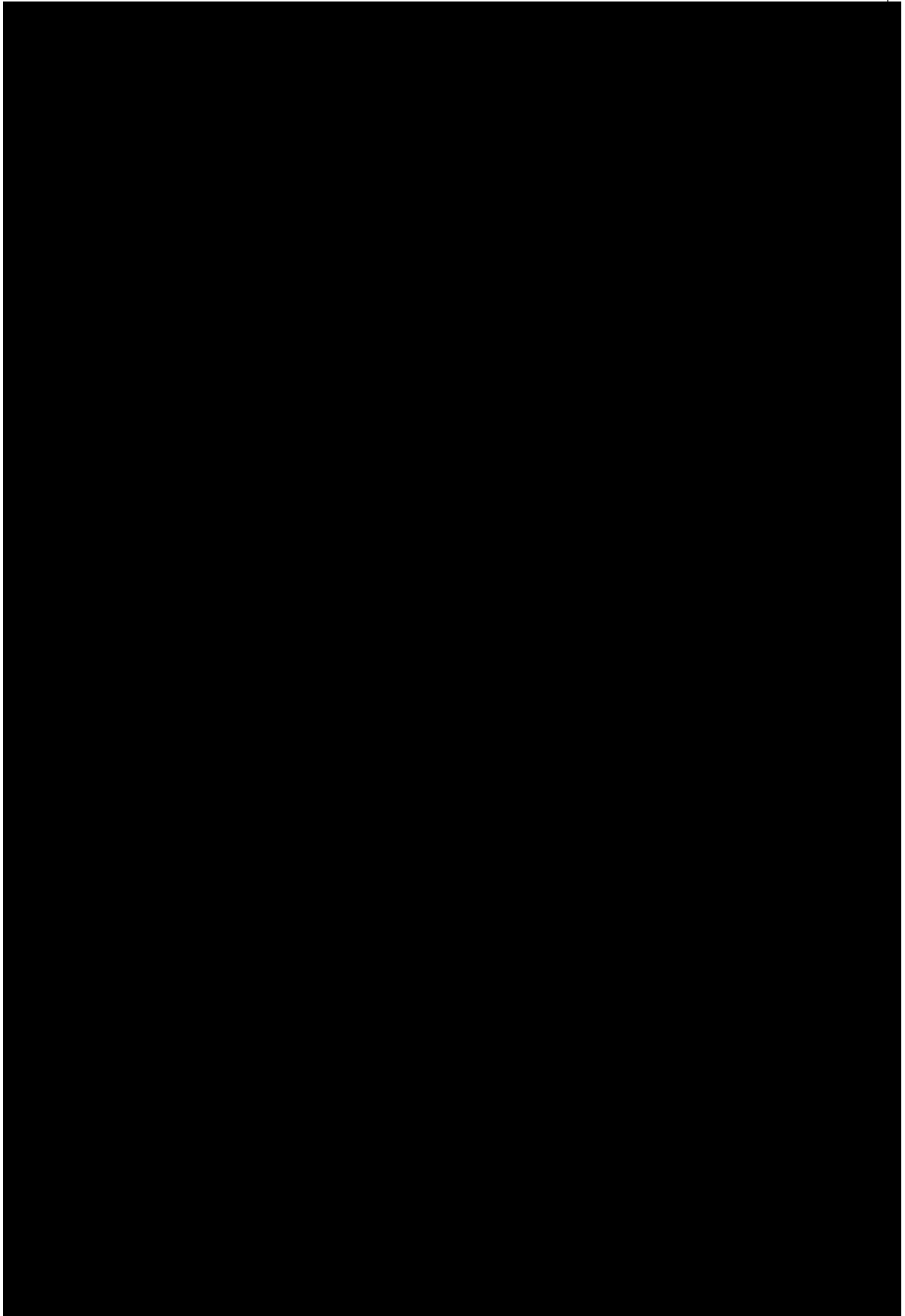


EXHIBIT 113

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

THOMSON REUTERS ENTERPRISE)	
CENTRE GMBH and WEST PUBLISHING)	
CORPORATION,)	
)	
Plaintiffs/)	
Counterdefendants,)	
)	
-vs-)	C.A. No. 20-613-SB
)	
ROSS INTELLIGENCE INC.,)	
)	
Defendant/)	
Counterclaimant.)	

Video-recorded deposition of CHAD SYVERSON,
PH.D., taken before TRACY L. BLASZAK, CSR, CRR, and
Notary Public, pursuant to the Federal Rules of Civil
Procedure for the United States District Courts
pertaining to the taking of depositions, at Suite 3600,
455 North Cityfront Plaza Drive, in the City of Chicago,
Cook County, Illinois at 9:01 a.m. on the 2nd day of
August, A.D., 2023.

1 There were present at the taking of this
2 deposition the following counsel:

3
4 KIRKLAND & ELLIS LLP by
5 MS. CHRISTA C. COTTRELL
6 300 North LaSalle Street
7 Chicago, Illinois 60654
8 (312) 862-2000
9 christa.cottrell@kirkland.com
10 on behalf of the Plaintiffs/
11 Counterdefendants;

12 CROWELL & MORING LLC by
13 MS. BEATRICE B. NGUYEN
14 3 Embarcadero Center
15 Suite 2600
16 San Francisco, California 94111
17 (415) 986-2800
18 bbnguyen@crowell.com
19 on behalf of the Defendant/
20 Counterclaimant;

21 ALSO PRESENT: Mr. Christopher Ody
22 Analysis Group;

23 Mr. Brandon Rackowski
24 Legal Videographer.

- - - - -

VIDEO-RECORDED DEPOSITION OF
CHAD SYVERSON, PH.D.

August 2, 2023

EXAMINATION BY:	PAGE
Ms. Beatrice B. Nguyen	6
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Ms. Christa C. Cottrell	194

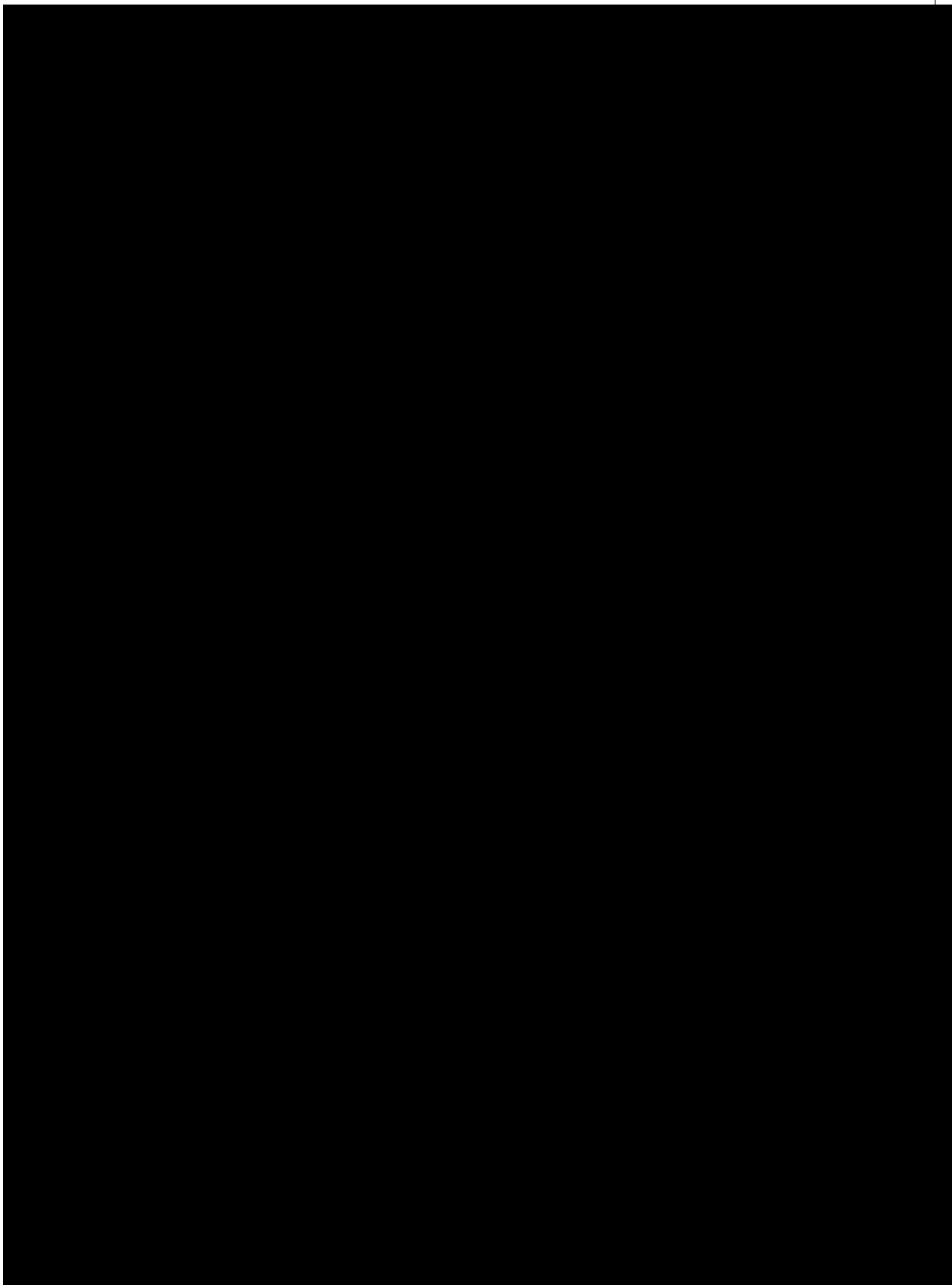
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INDEX OF EXHIBITS

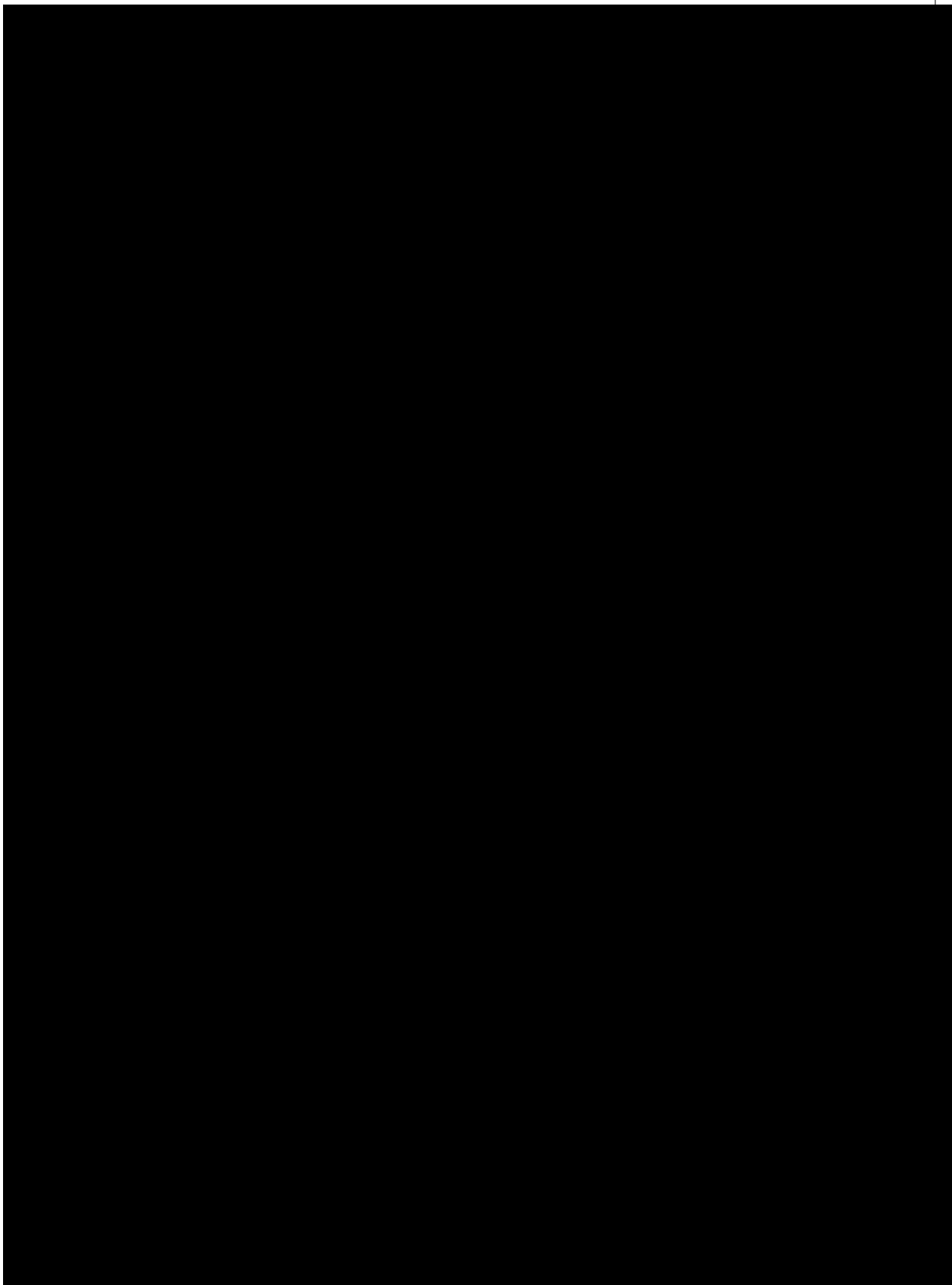
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Exhibit 3	Reply report of defendant/counterclaimant's expert James D. Ratliff, Ph.D.	16
Exhibit 4	Report of defendant/counterclaimant's expert Gillian K. Hadfield, J.D., Ph.D.	16
Exhibit 5	Report of defendant/counterclaimant's expert Dr. Peter W. Martin, J.D.	16
Exhibit 6	E-mail from Ginder to Thomson-Ross 5/1/23	34
Exhibit 7	E-mail from Augustin to Martens 3/19/21	119

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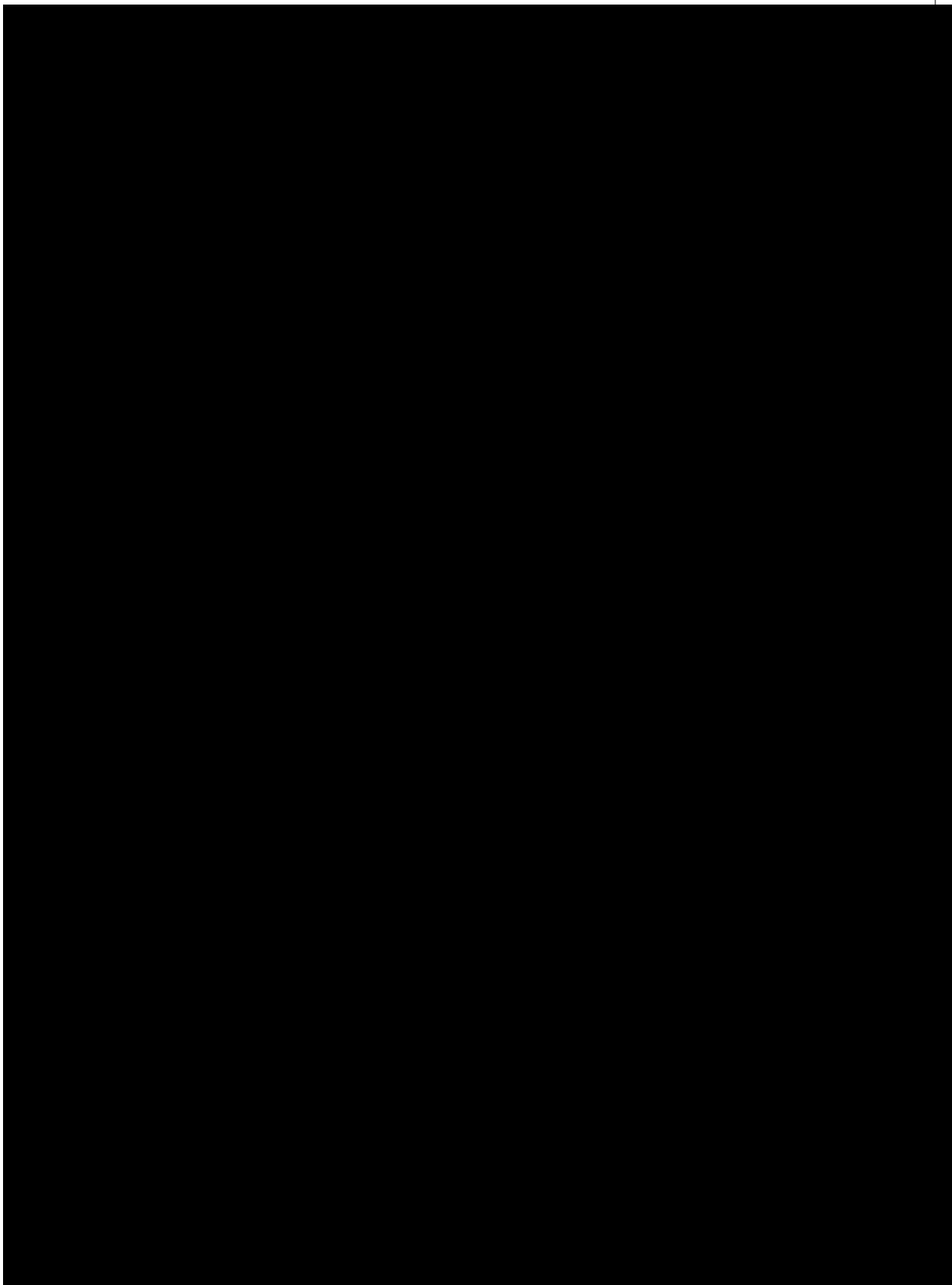
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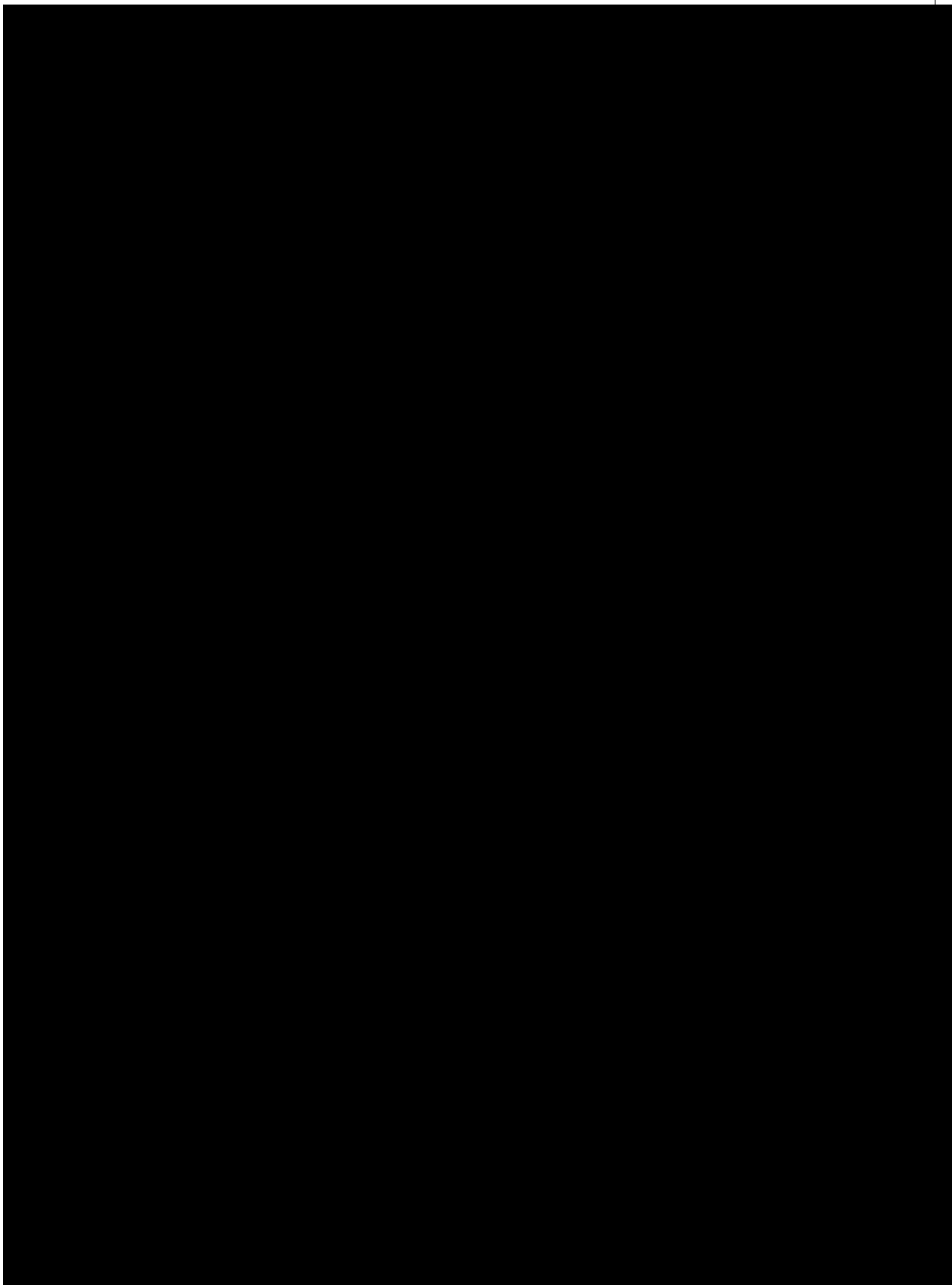
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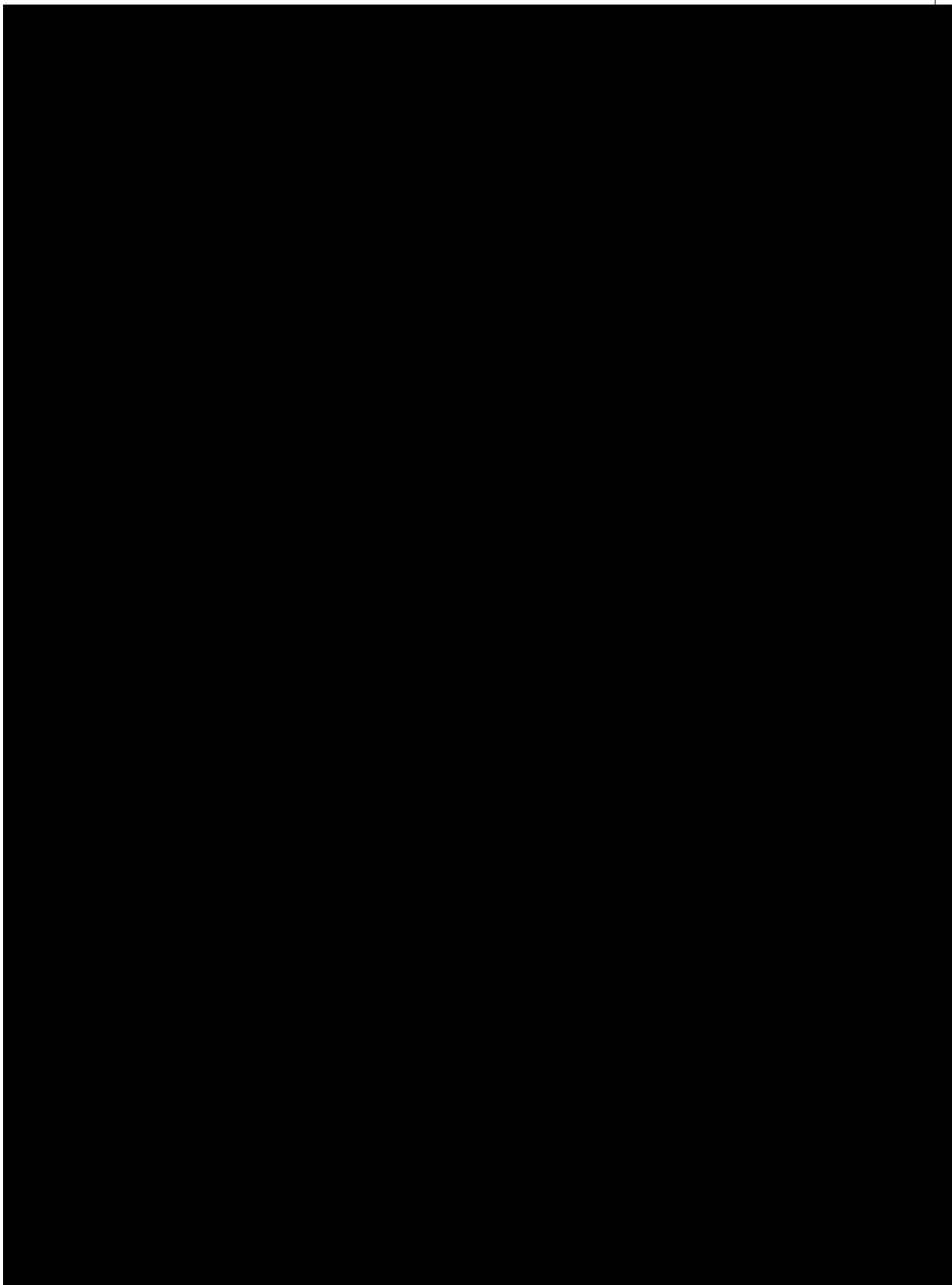
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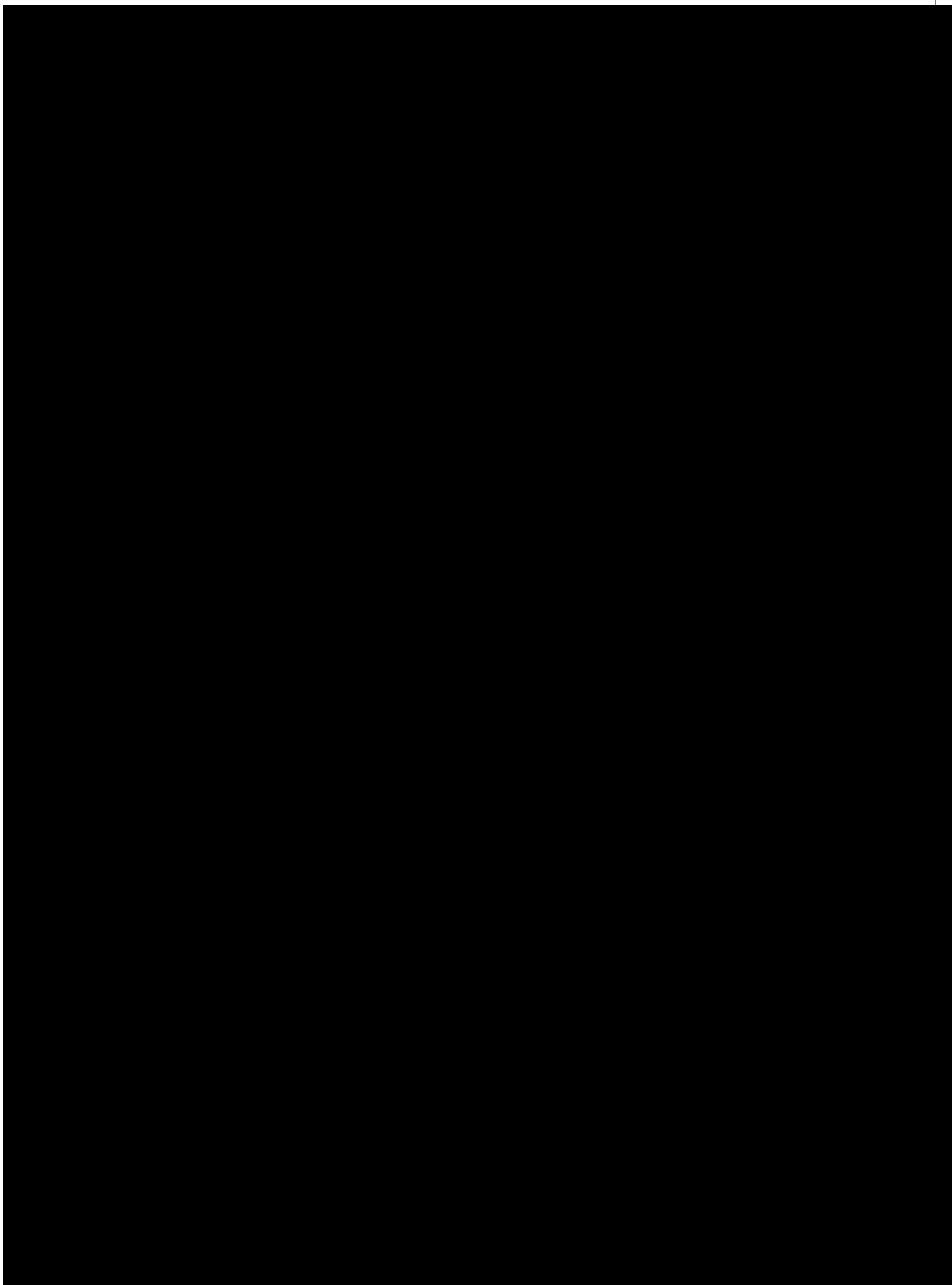
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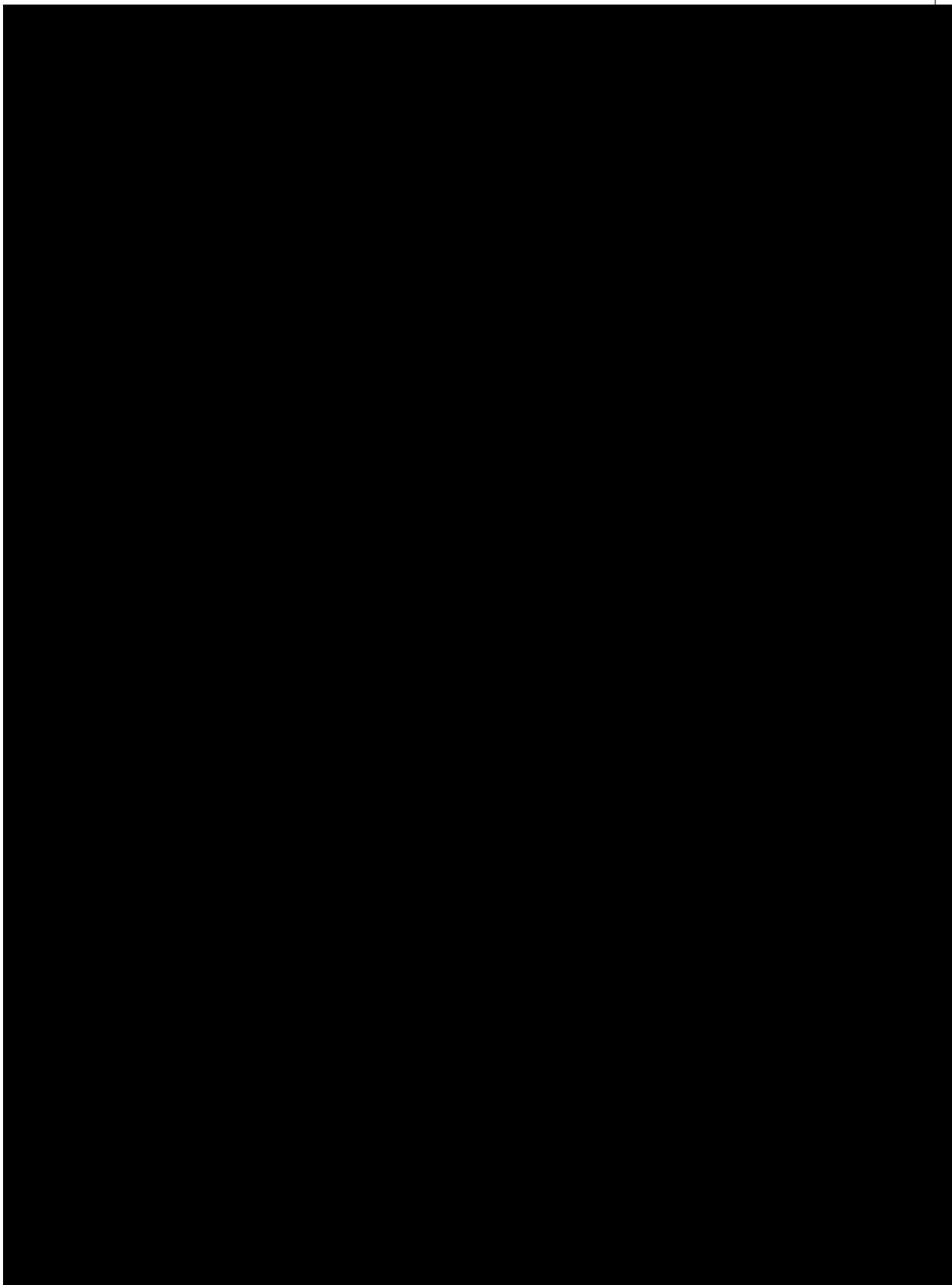
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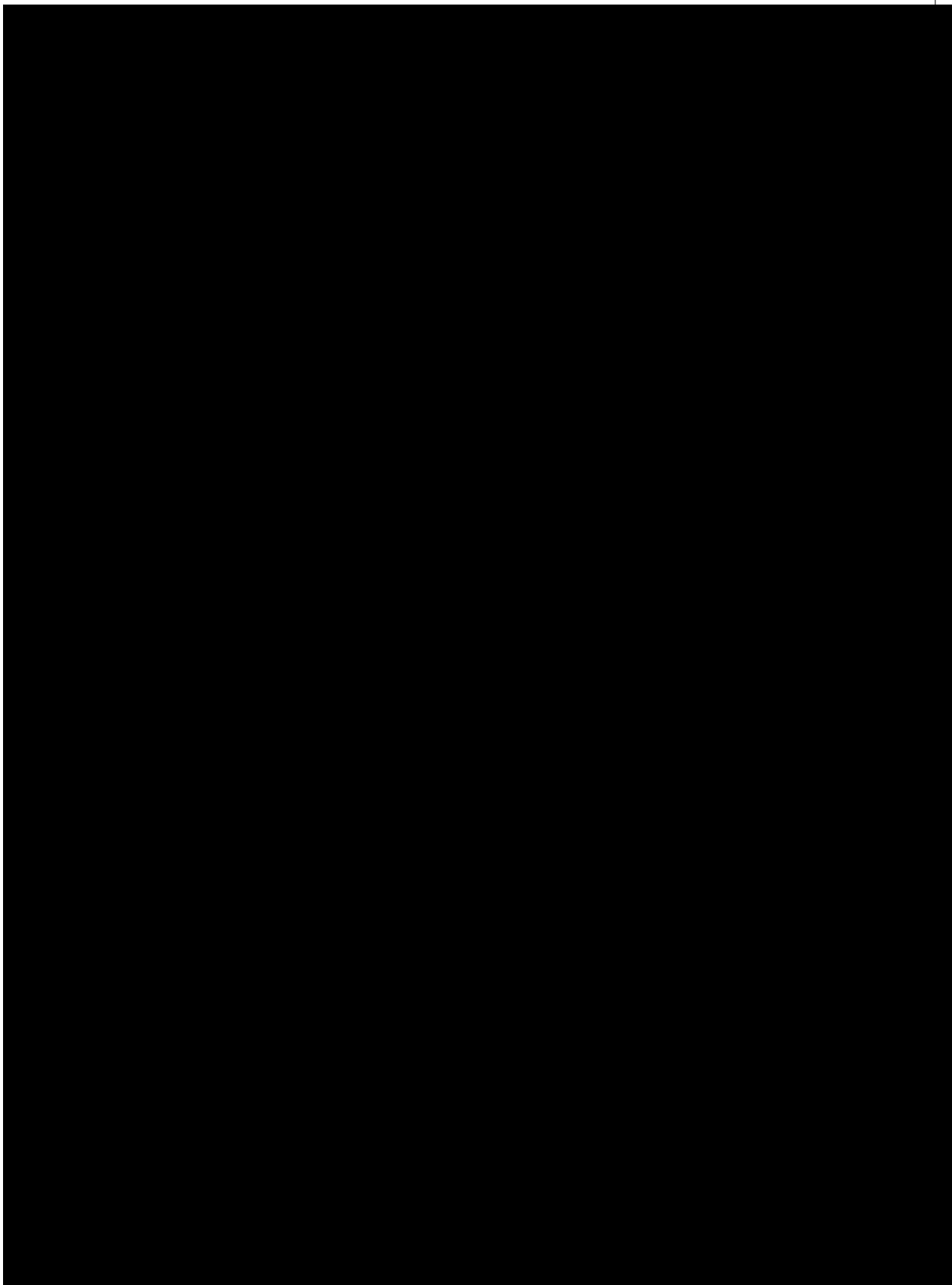


EXHIBIT 114

UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF DELAWARE

THOMSON REUTERS ENTERPRISE)
CENTRE GMBH and WEST)
PUBLISHING CORPORATION,)

Plaintiffs and)
Counterdefendants,)

vs.)

C.A. No. 20-613 (LPS)

ROSS INTELLIGENCE, INC.,)
Defendant and)
Counterplaintiff.)

HIGHLY CONFIDENTIAL

VIDEOTAPED 30(b)(6) DEPOSITION OF DEFENDANT,

by and through its corporate designee

TOMAS VAN DER HEIJDEN,

(also in his individual capacity)

London, England, United Kingdom

Thursday, March 17, 2022

Pages: Pages 1 - 443

Reported stenographically by:

LEAH M. WILLERSDORF, RPR-CRR-FBIVR-ACR-QRR2-CLR

Thursday, March 17, 2022

09:29 a.m.
(Greenwich Mean Time)

Videotaped 30(b)(6) deposition of Defendant, by and through its corporate representative Tomas van der Heijden, as well as in his individual capacity, held at the offices of Kirkland & Ellis International LLP, 30 St. Mary Axe, London EC3A 8AF, England, United Kingdom, before Leah Willersdorf, Registered Professional Reporter and Certified Realtime Reporter with the US National Court Reporters Association, and Accredited Court Reporter, Qualified Realtime Reporter (Level 2) and Fellow of the British Institute of Verbatim Reporters, and Certified LiveNote Reporter.

A P P E A R A N C E S

On behalf of Plaintiffs and Counterdefendants:

KIRKLAND & ELLIS, LLP

601 Lexington Avenue
New York, New York 10022
(212) 446 4800

BY: JOSHUA L. SIMMONS, ESQ.
JENNIFER GIBBINS, ESQ.
joshua.simmons@kirkland.com
jennifer.gibbins@kirkland.com

On behalf of Defendant and Counterplaintiff:

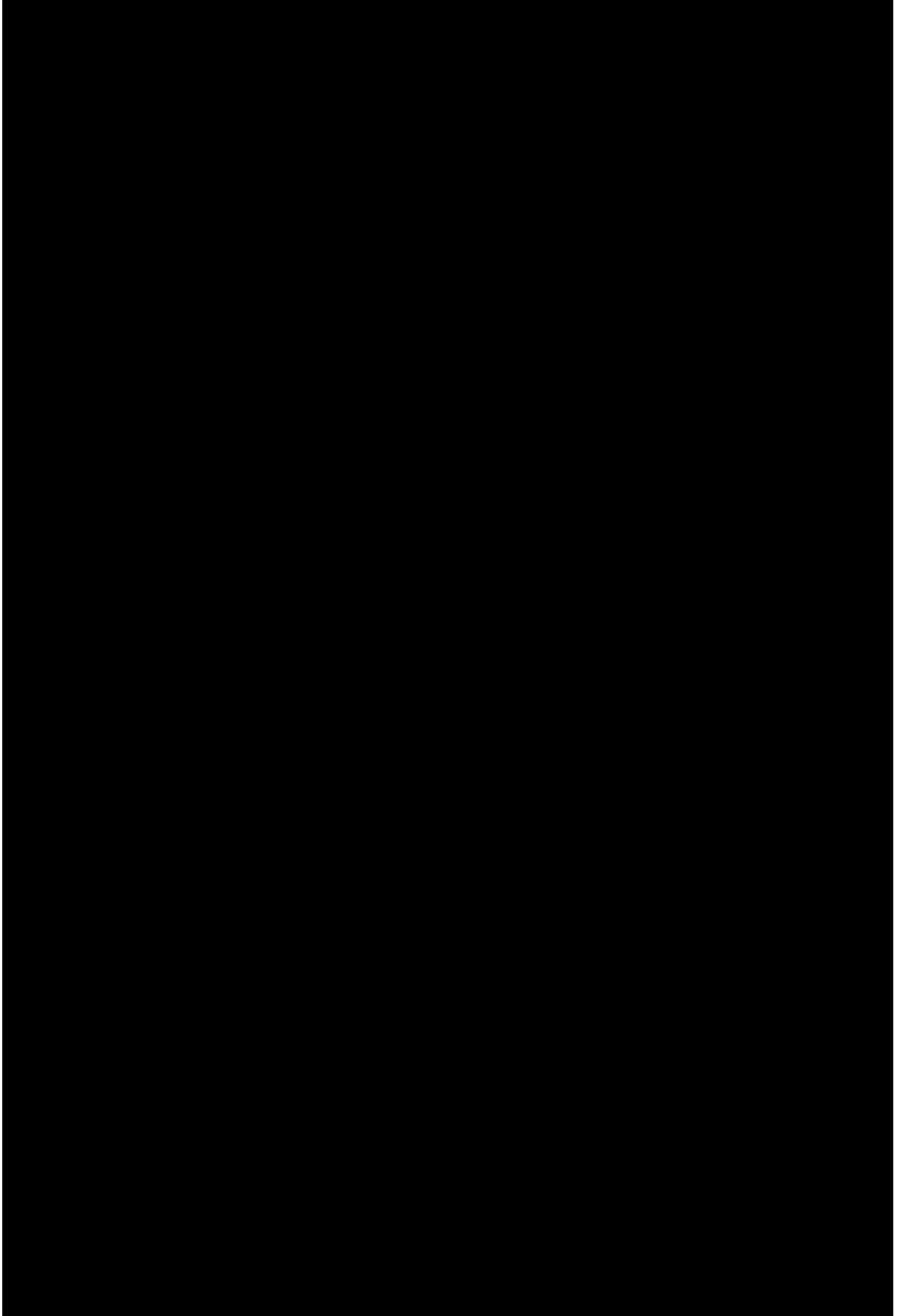
CROWELL & MORING, LLP

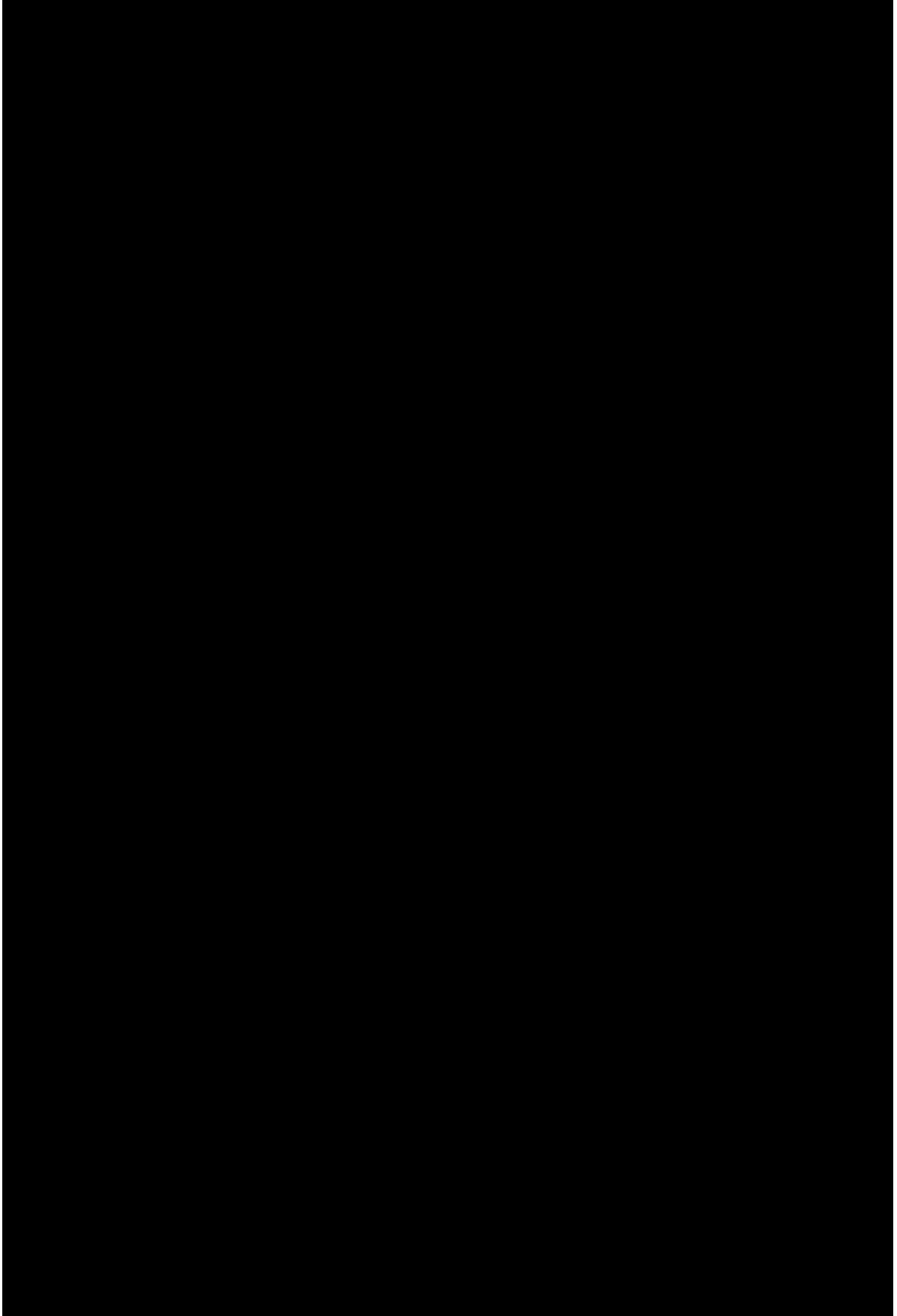
3 Embarcadero Center
26th Floor
San Francisco, CA 94111
(415) 986 2800

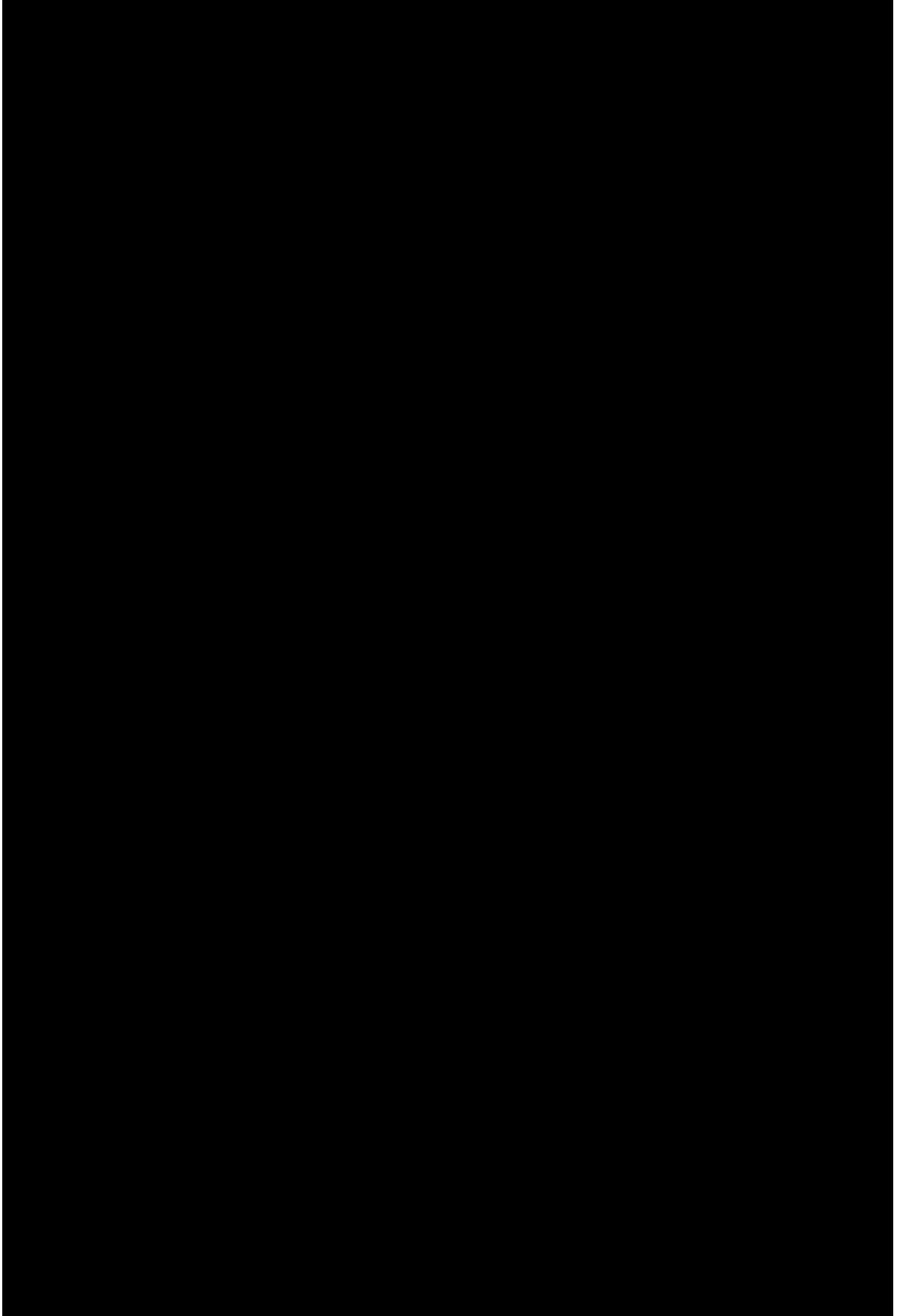
BY: KAYVAN M. GHAFARI, ESQ.
kghaffari@crowell.com

ALSO PRESENT:

Linda Fleet - Videographer







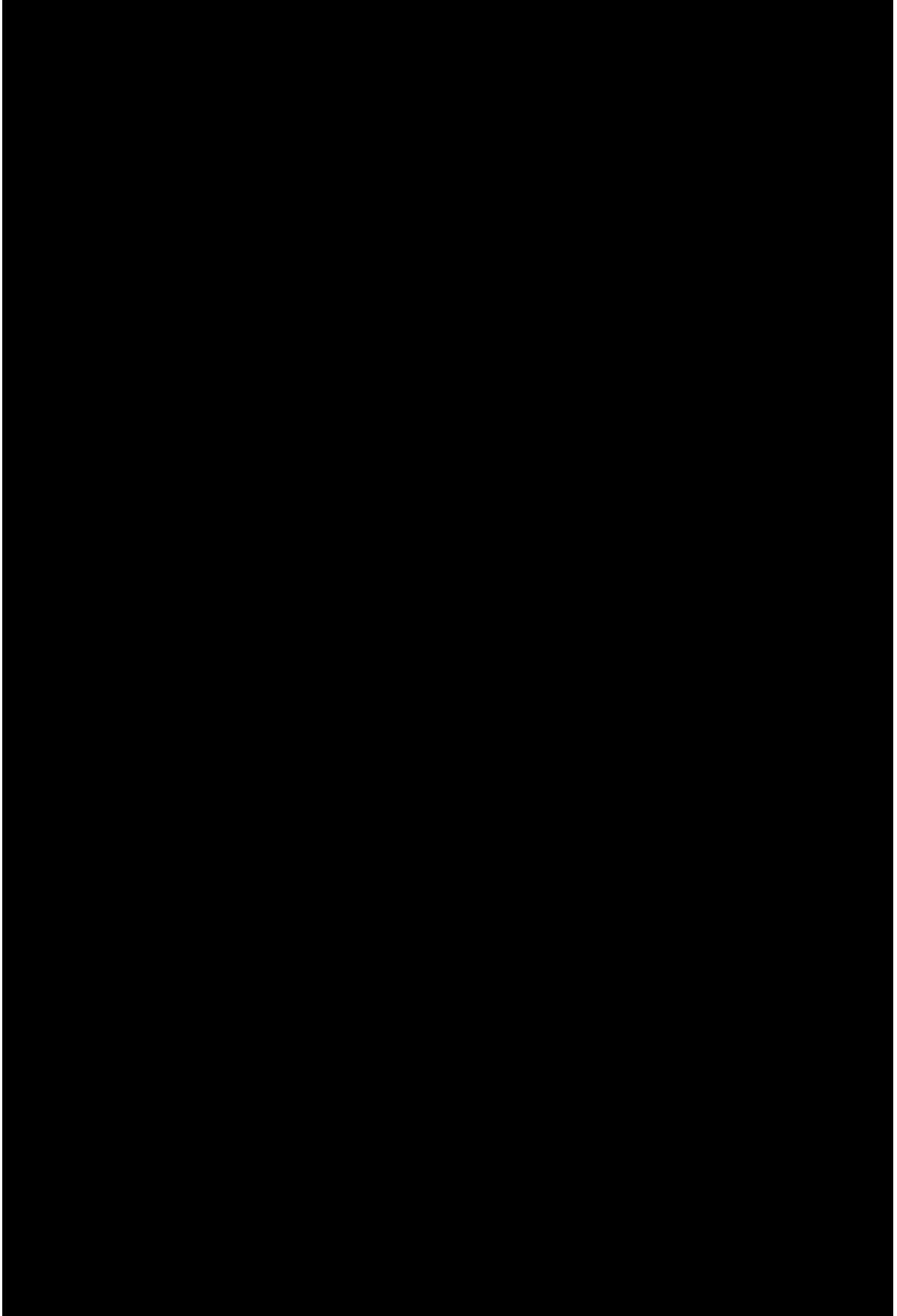


EXHIBIT 115

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1 IN THE UNITED STATES DISTRICT COURT

2 FOR THE DISTRICT OF DELAWARE

3 No. 1:20-cv-00613-UNA.

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6 THOMSON REUTERS ENTERPRISE
7 CENTRE GMBH and WEST PUBLISHING
8 CORPORATION,

9 Plaintiffs,

10 -vs-

11 ROSS INTELLIGENCE INC.,
12 Defendant.

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16 CONFIDENTIAL - ATTORNEYS' EYES ONLY

17 REMOTE TESTIMONY OF ANDREW ARRUDA

18 MAY 19, 2023 - 7:58 A.M. PDT
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24 JOB NO. 2023-895666

MAY 19, 2023

7:58 A.M. PDT

DEPOSITION of ANDREW ARRUDA, before S.
Arielle Santos, Certified Court Reporter,
Certified LiveNote Reporter and Notary Public.

3

REMOTE APPEARANCES:

COUNSEL FOR PLAINTIFF:

BY - DAN LAYTIN, ESQ.

KIRKLAND & ELLIS LLP

300 North LaSalle

Chicago, IL 60654

COUNSEL FOR DEFENDANT:

BY - GABRIEL RAMSEY, ESQ.

BY - CRINESHA BERRY, ESQ.

CROWELL & MORING LLP

3 Embarcadero Center, 26th Floor

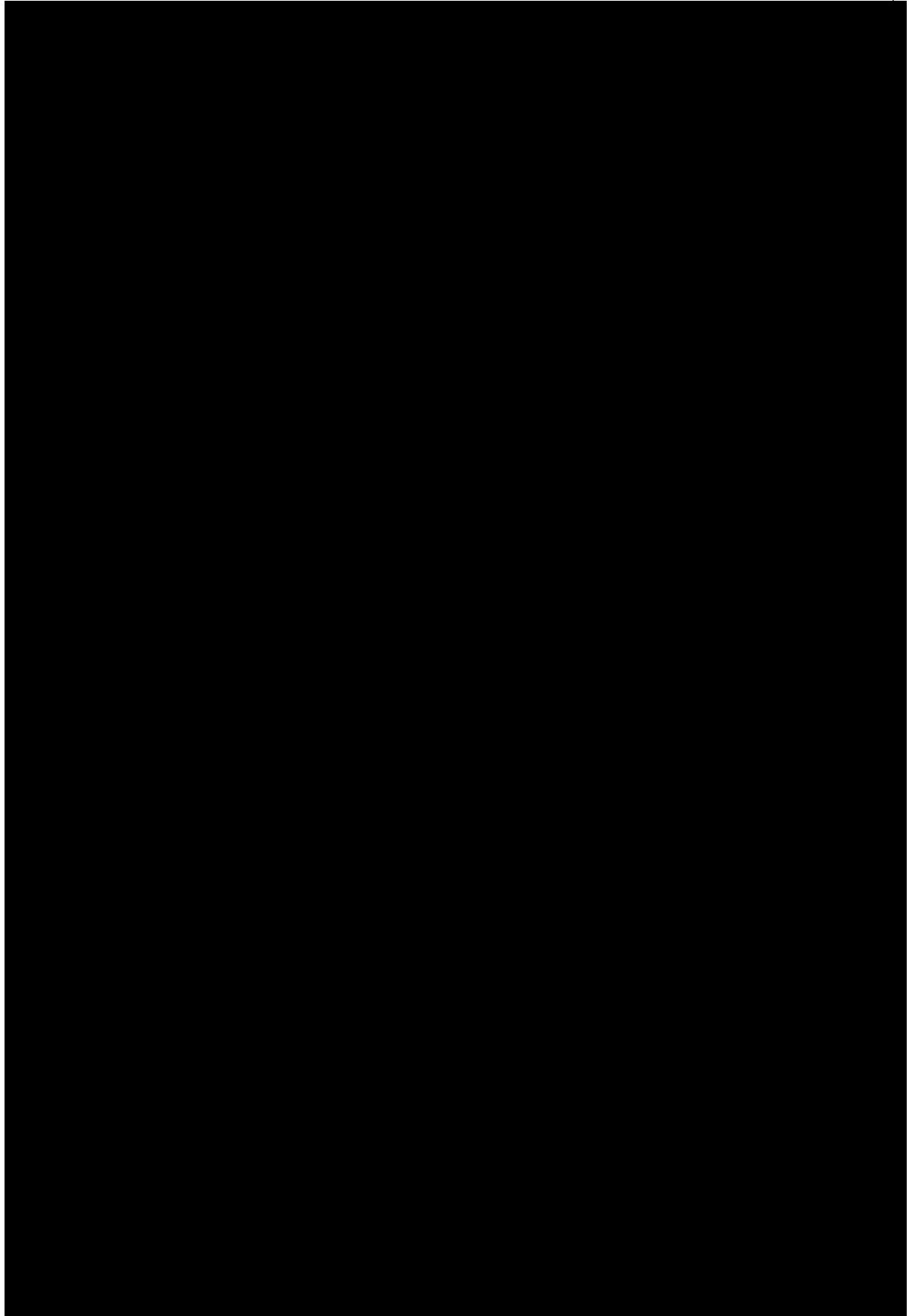
San Francisco, CA 94111

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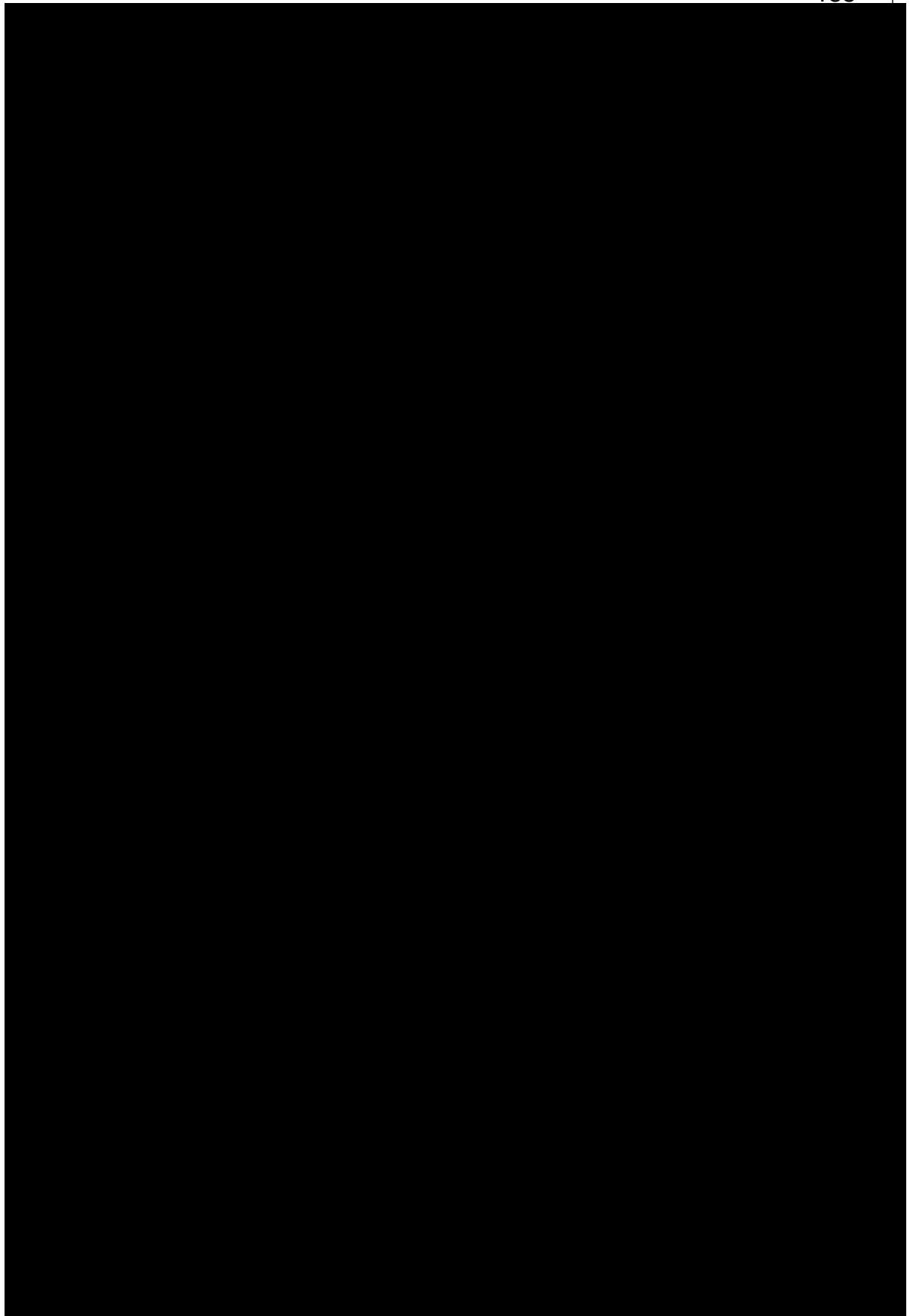
ROMAN BIELSKI, Kirkland Tech

BRYAN BELTRAN, Lexitas

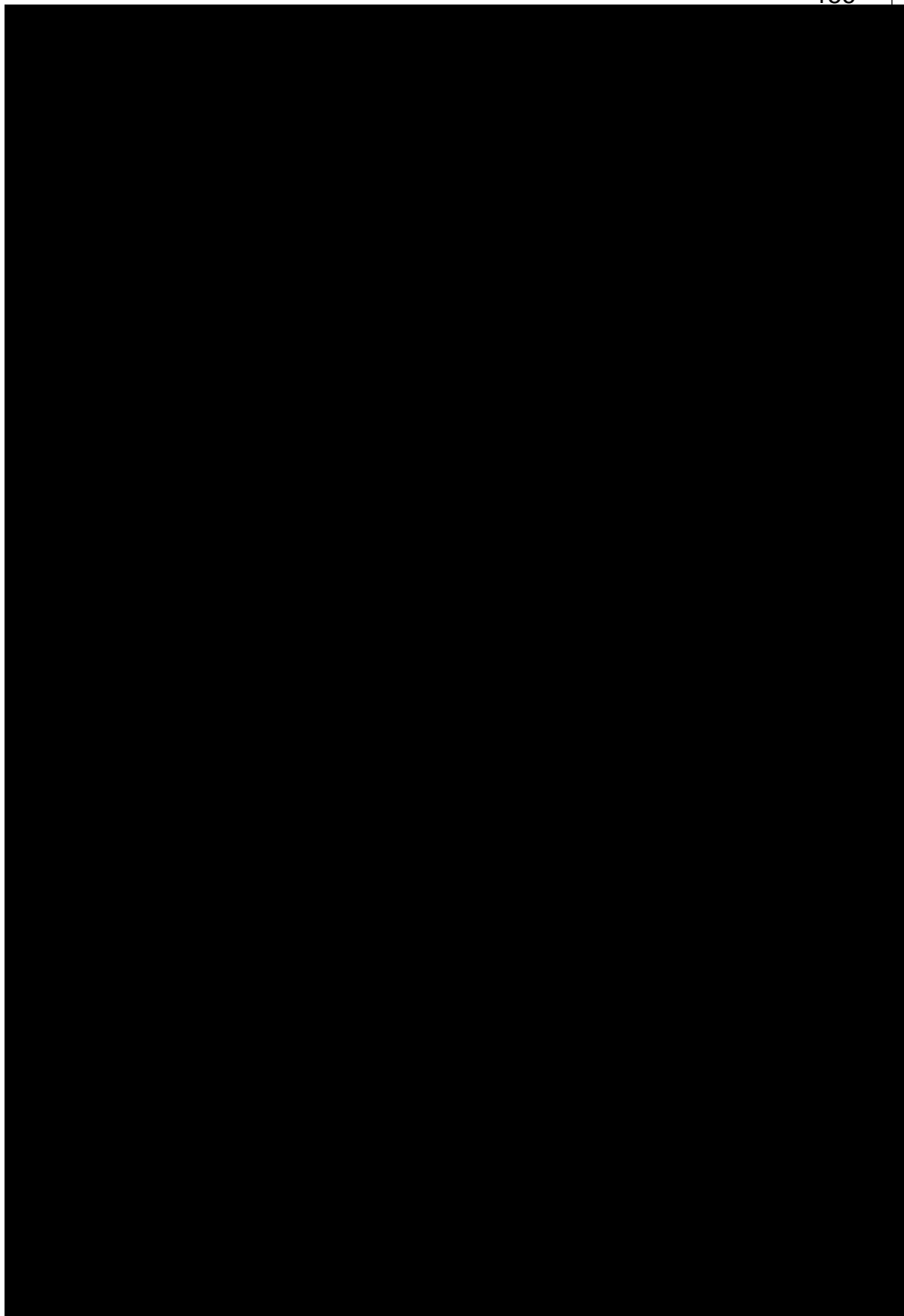
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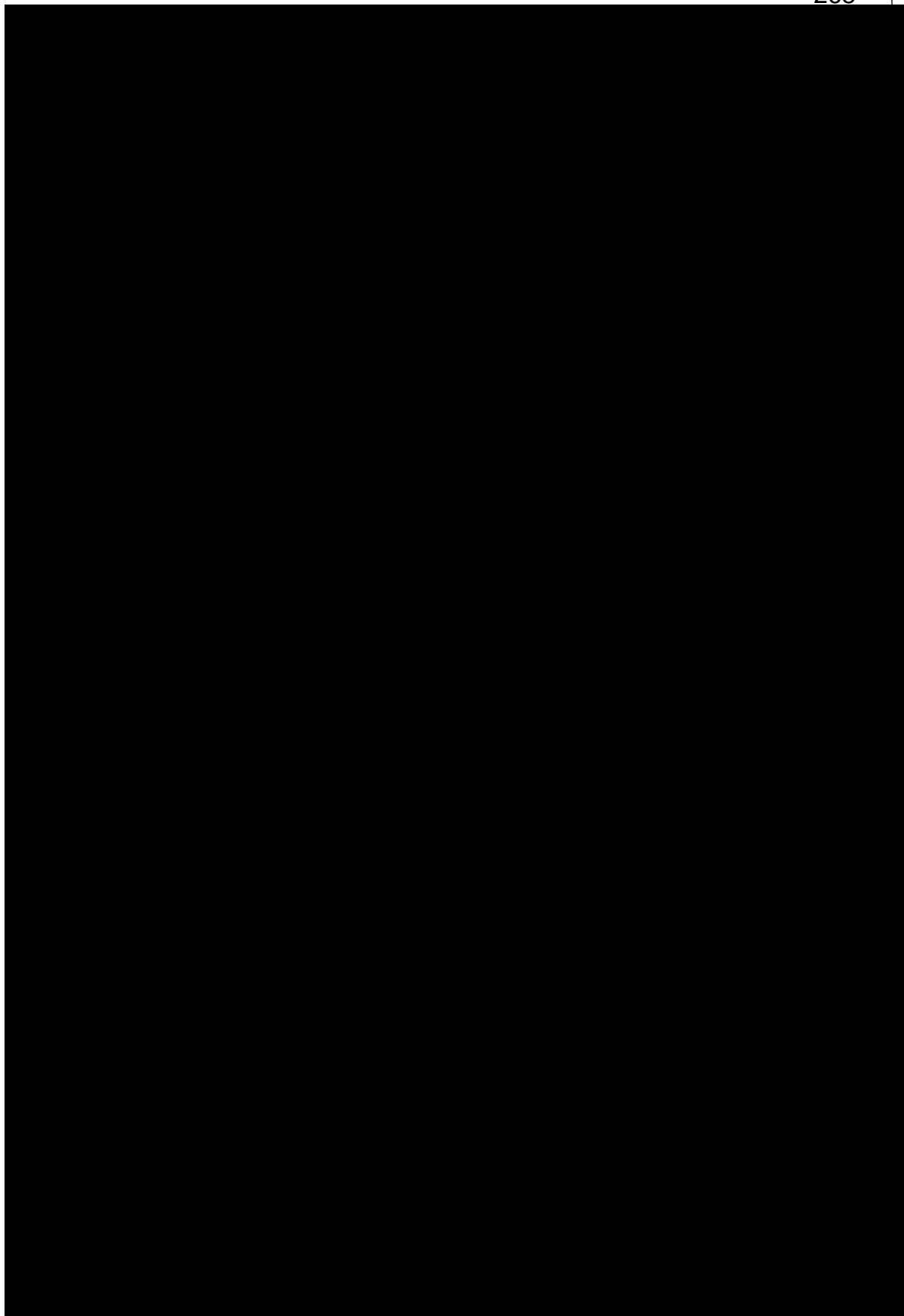
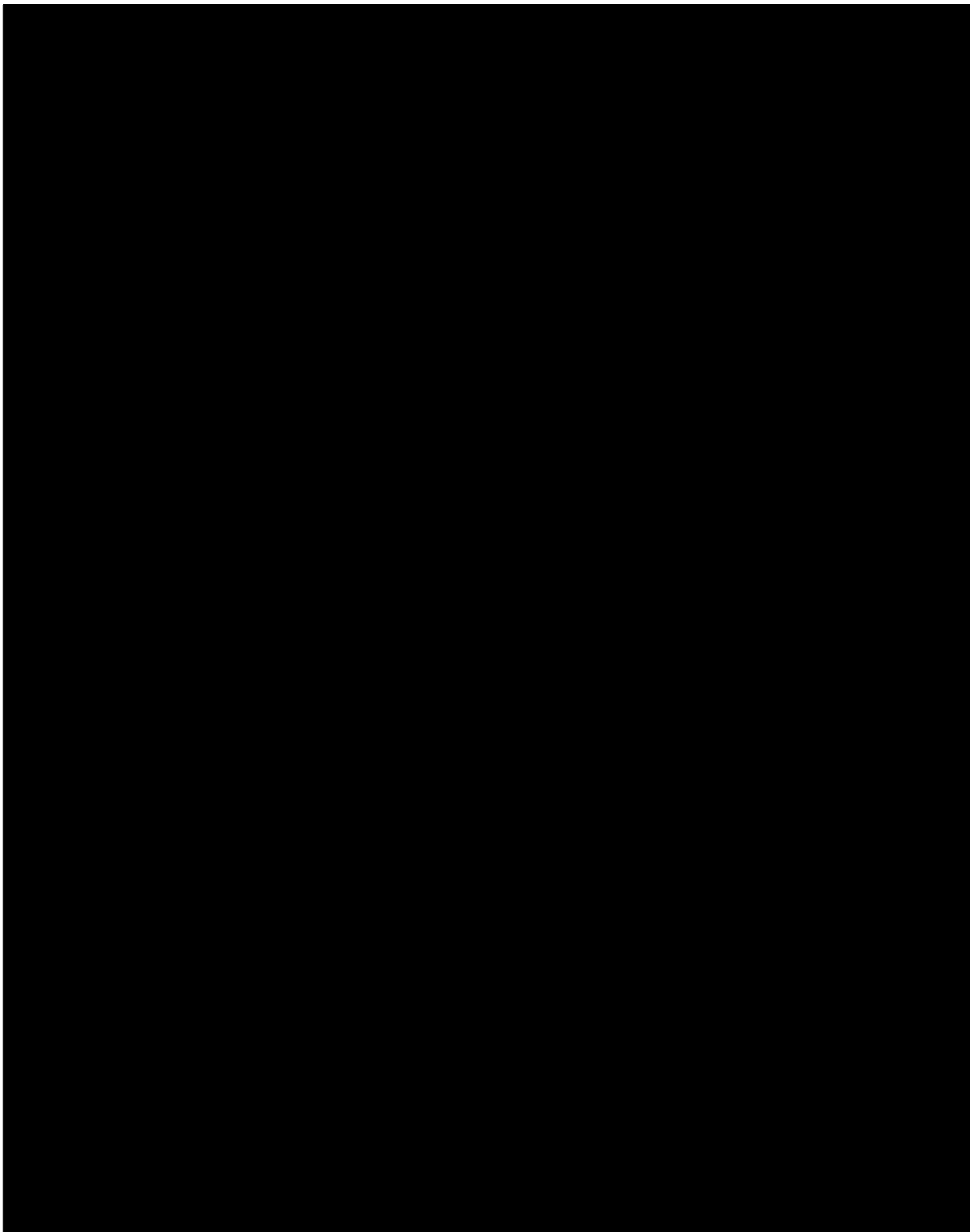
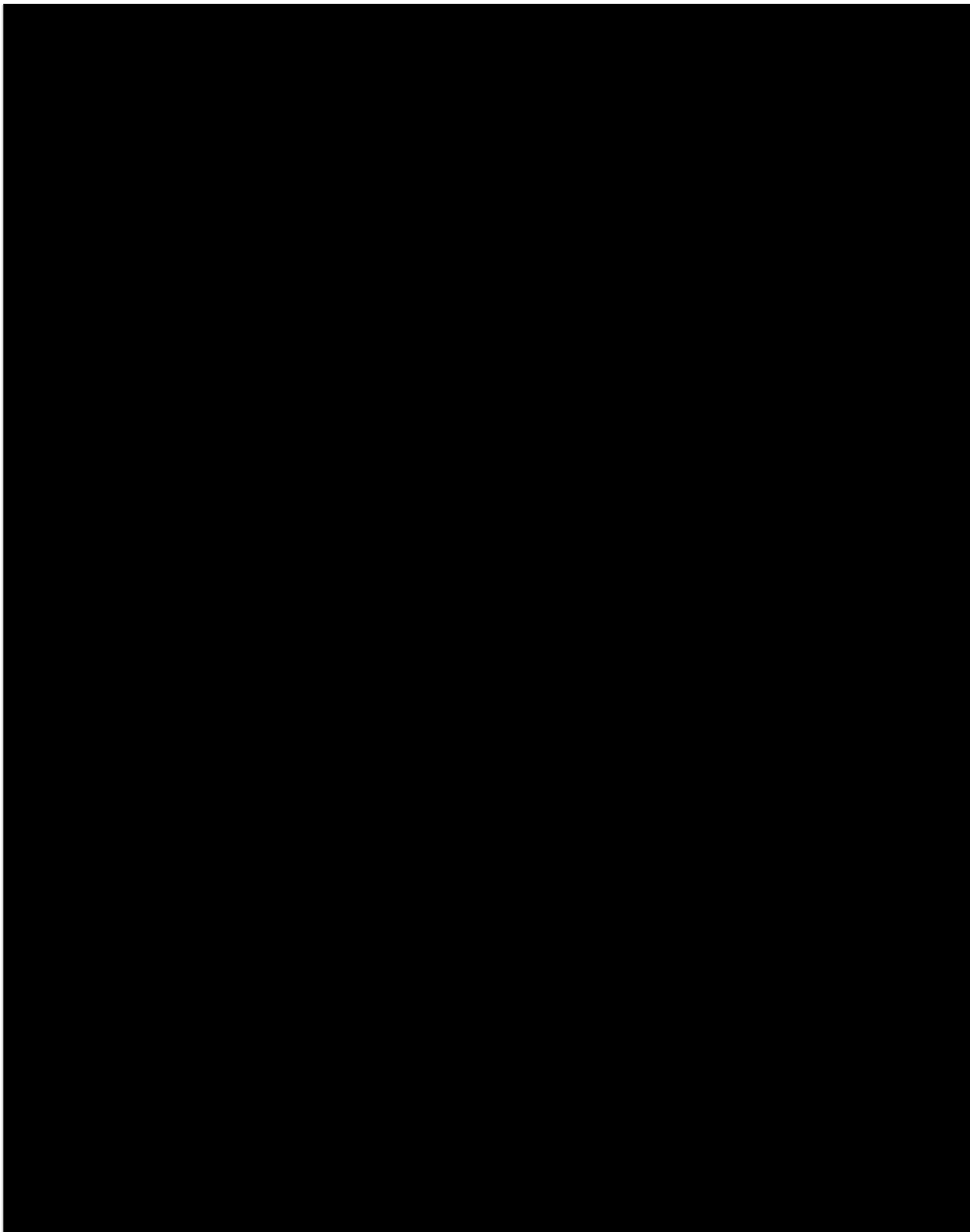


EXHIBIT 116

EXHIBIT 117





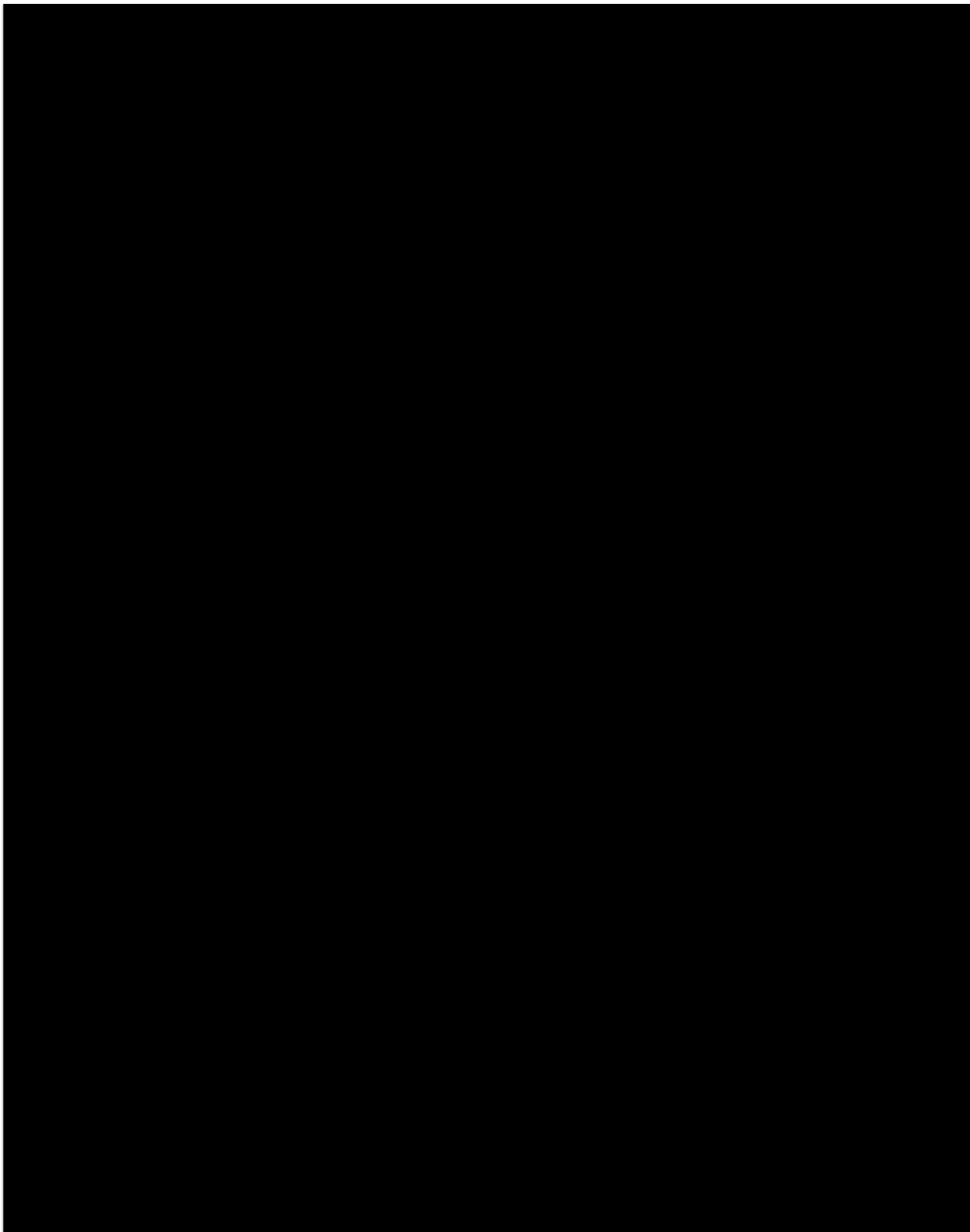
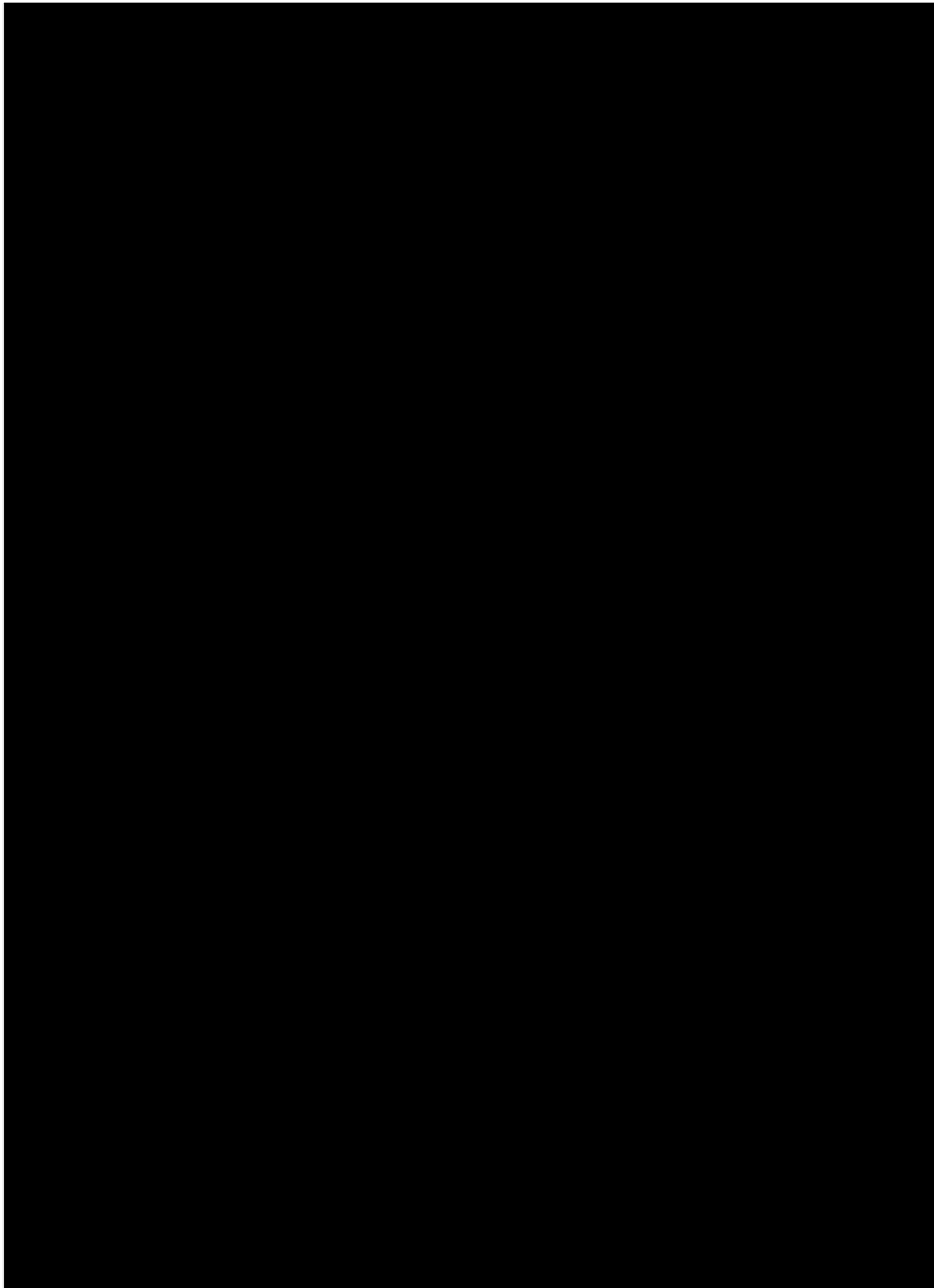
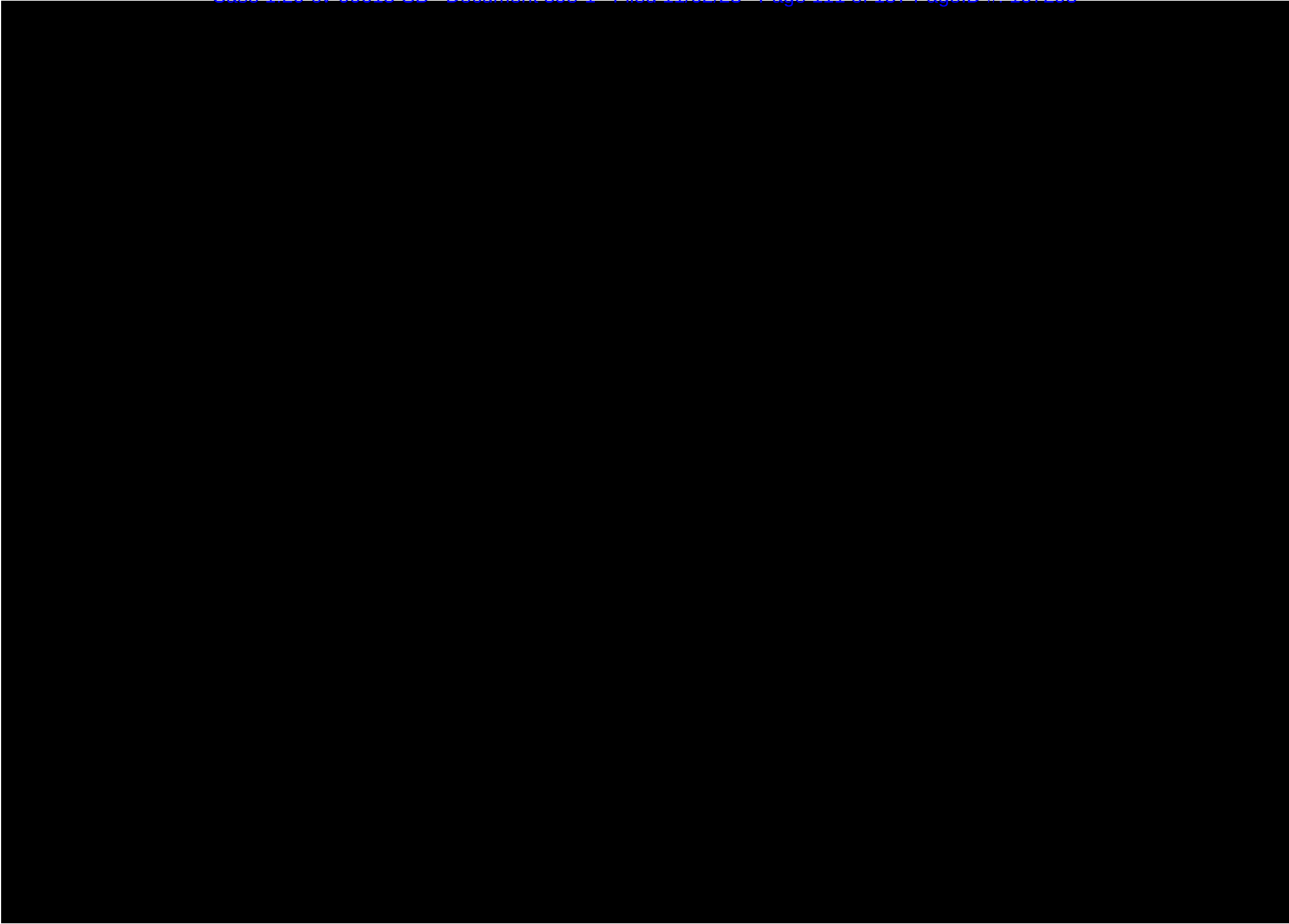
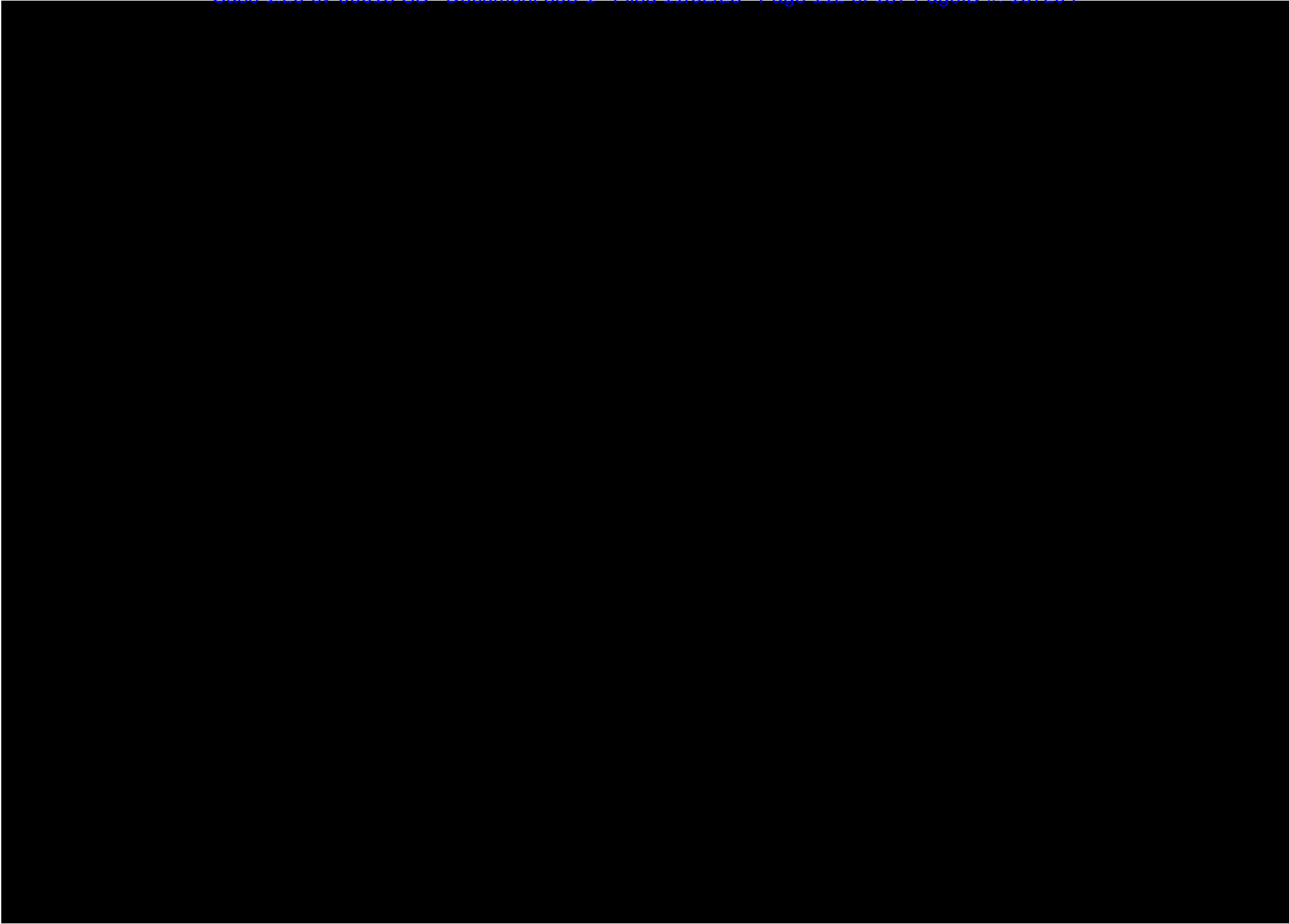
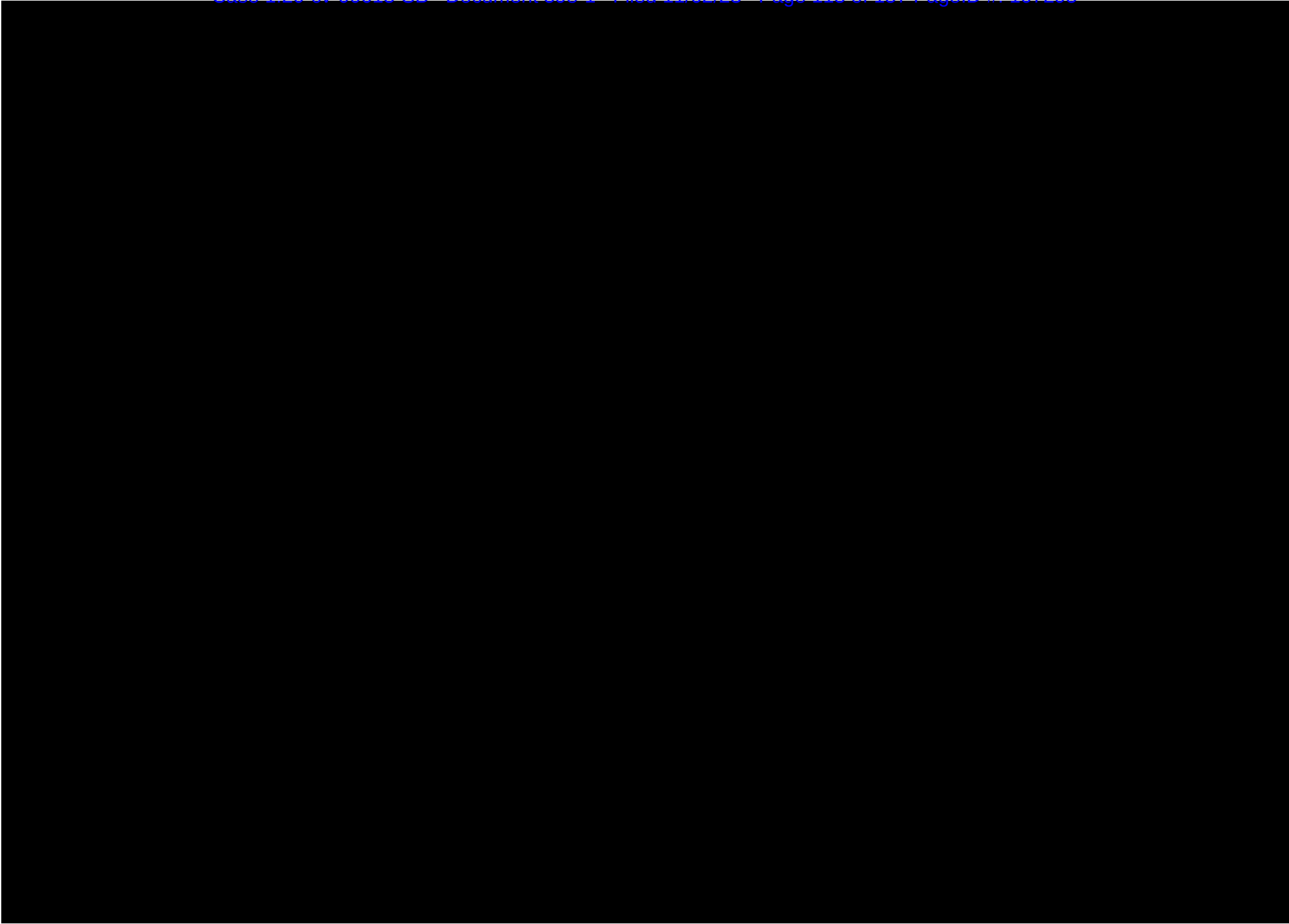


EXHIBIT 118



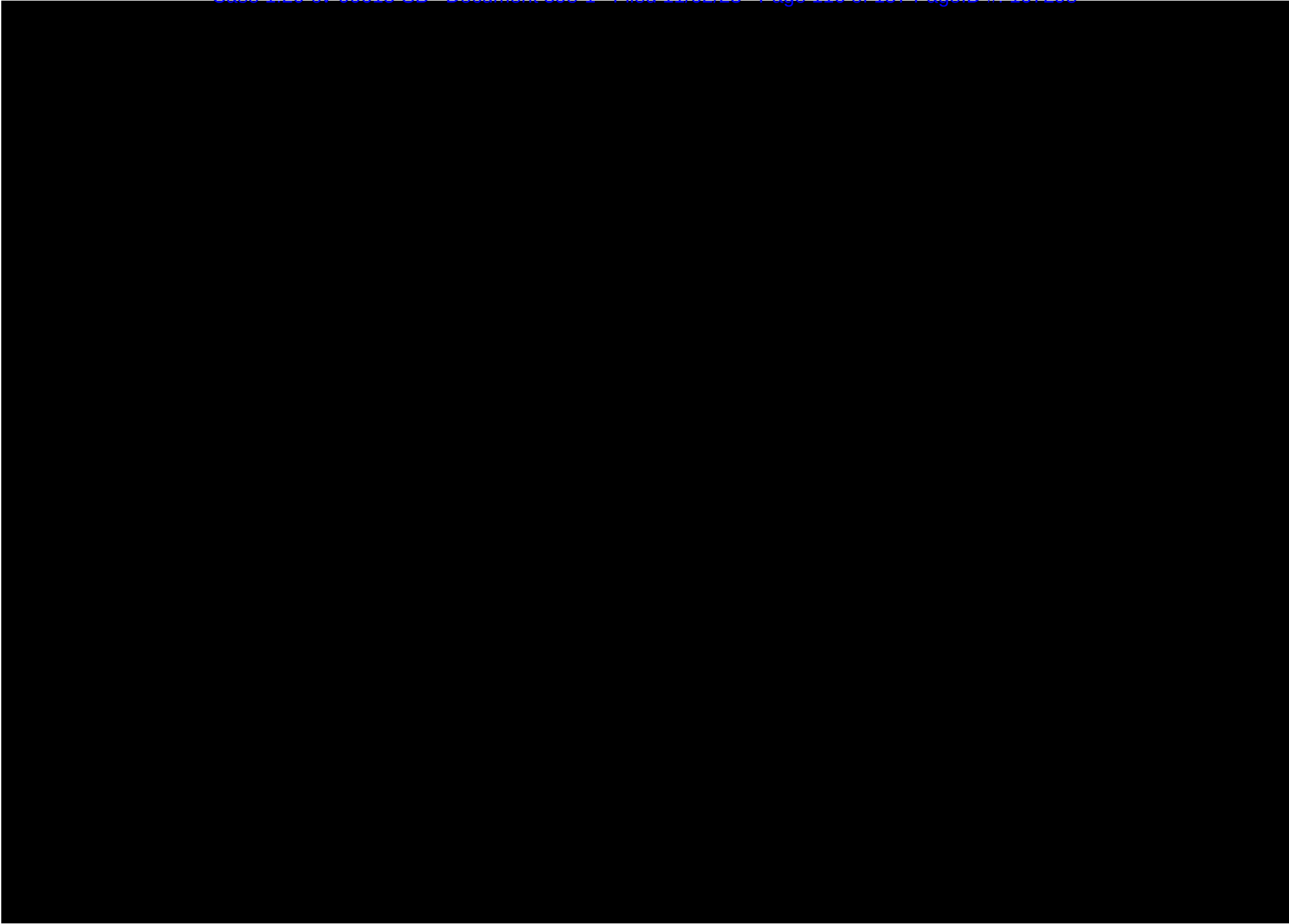












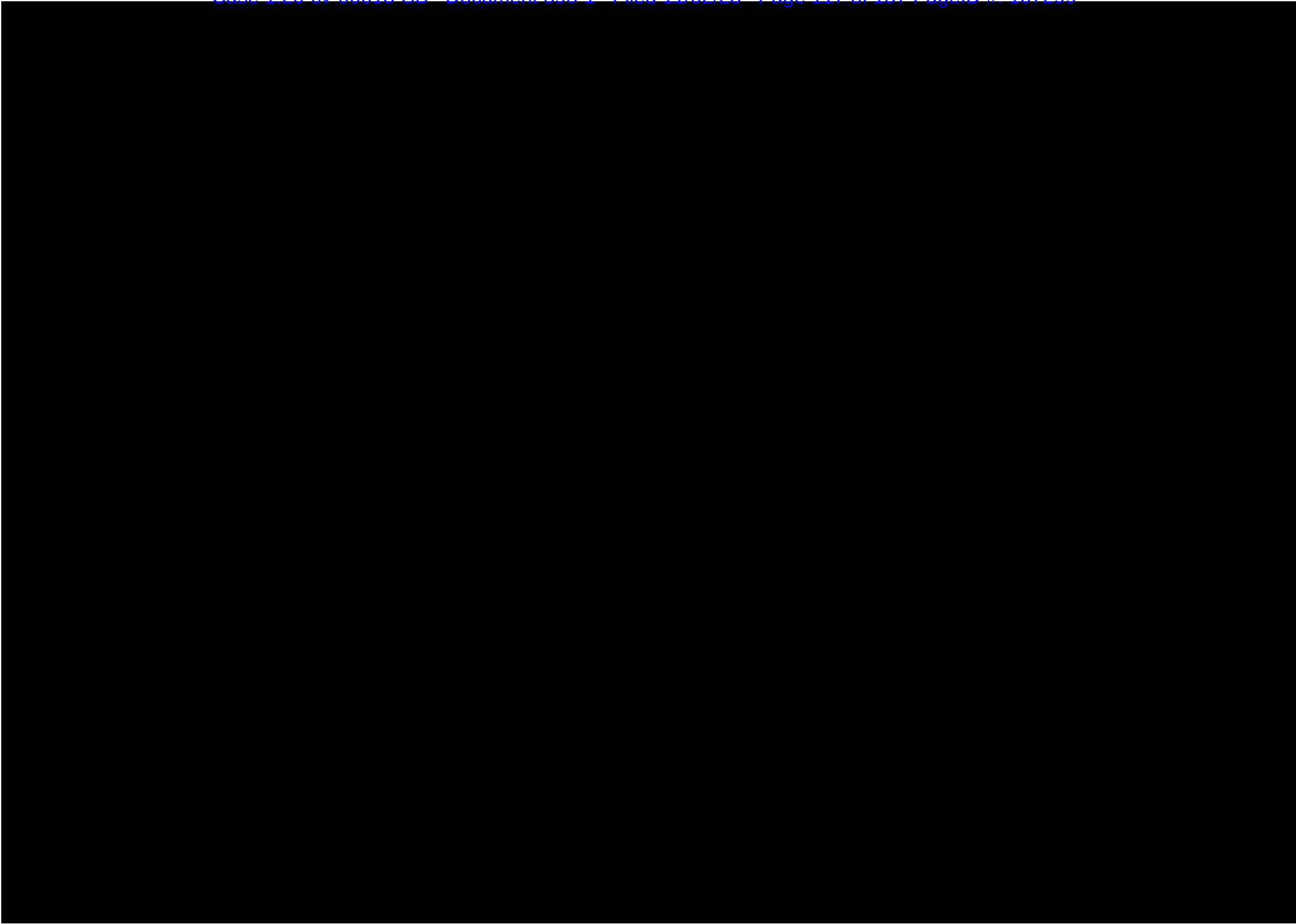


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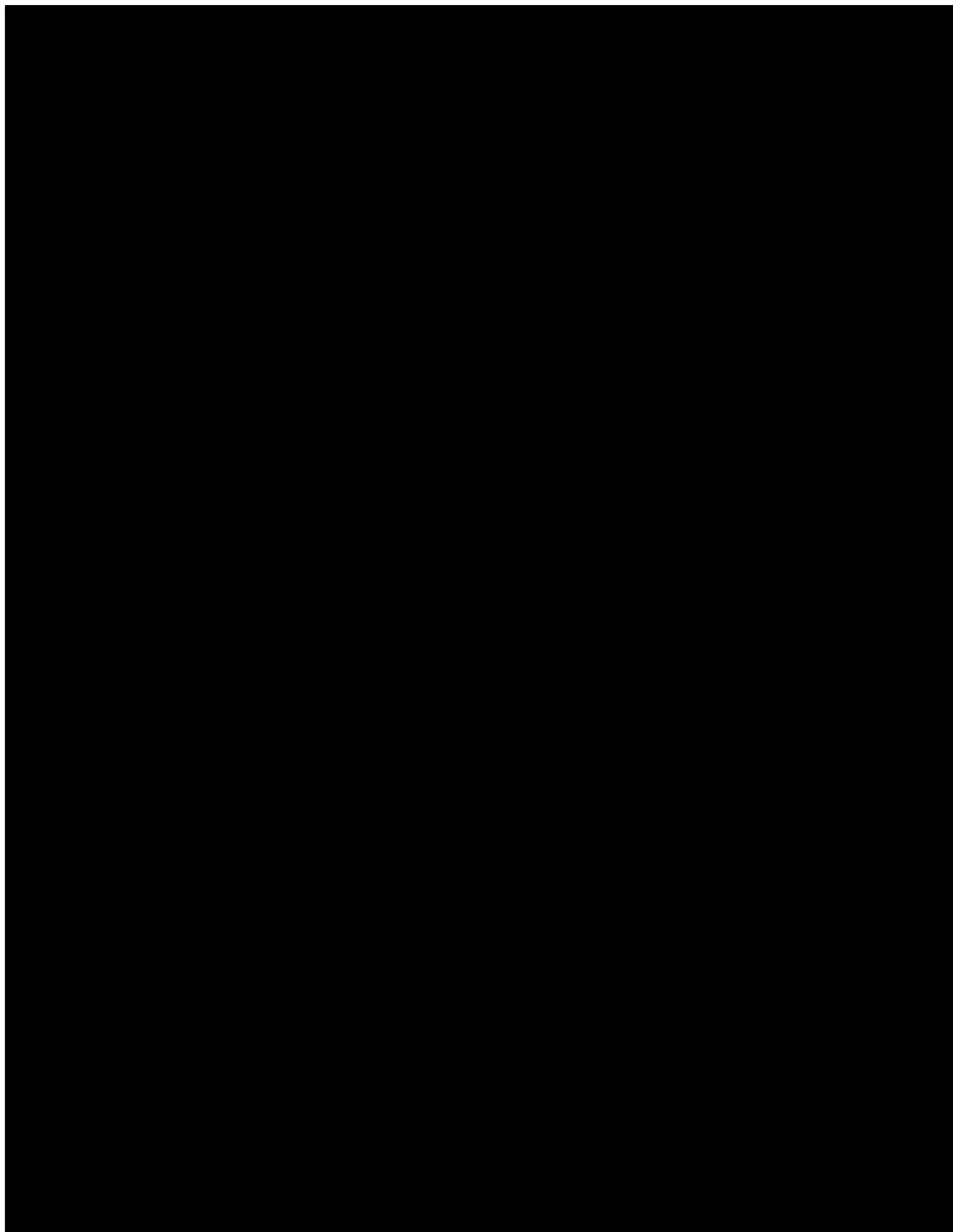


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